

EXHIBIT B

UNITED STATES DISTRICT COURT OF NEW YORK  
EASTERN DISTRICT OF NEW YORK

- - - - - x

LACHANCE DEON BRYANT,

Plaintiff,

-against-

PETER RYAN and JOHN LEDDY,

Defendants.

- - - - - x

Sing-Sing Correctional  
Facility  
Ossining, New York

January 16, 2019  
11:50 a.m.

EXAMINATION BEFORE TRIAL of LACHANCE  
DEON BRYANT, the Plaintiff in the above-entitled  
action, taken by the Defendant, held at the  
above time and place, pursuant to Federal  
Rules of Civil Procedure, taken before Robyn  
Lehrmann, a Notary Public in and for the  
State of New York.

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A P P E A R A N C E S :

LACHANCE DEON BRYANT

Pro Se

83 East Hudson Street

Long Beach, New York 11561

CAMPOLO, MIDDLETON & MCCORMICK, LLP

Attorneys for Defendants

4175 Veterans Memorial Highway

Suite 400

Ronkonkoma, New York 11779

BY: SCOTT MIDDLETON, ESQ.

ALSO PRESENT:

OFFICER WOLPINSKY

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STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED by  
and among counsel for the respective parties  
hereto, that the sealing and certification of  
the within deposition shall be and the same  
are hereby waived;

IT IS FURTHER STIPULATED AND AGREED  
that all objections, except to the form of  
the question, shall be reserved to the time  
of the trial;

IT IS FURTHER STIPULATED AND AGREED  
that the within deposition may be signed  
before any Notary Public with the same force  
and effect as if signed and sworn to before  
the Court.

1  
2 L A C H A N C E D E O N B R Y A N T,  
3 the Plaintiff herein, having been  
4 first duly sworn by a Notary Public  
5 of the State of New York, was  
6 examined and testified as follows:

7 EXAMINATION BY

8 MR. MIDDLETON:

9 Q State your name for the record,  
10 please.

11 A Lachance Deon Bryant.

12 Q State your address for the  
13 record, please.

14 A 83 East Hudson Street, Long  
15 Beach, New York 11561.

16 MR. MIDDLETON: Please  
17 mark these.

18 (Complaint was marked as  
19 Respondents' Exhibit A for  
20 identification, as of this  
21 date.)

22 (Statement was marked as  
23 Respondents' Exhibit B for  
24 identification, as of this  
25 date.)

1 Lachance Deon Bryant

2 (Handwritten Response to  
3 Interrogatories was marked as  
4 Respondents' Exhibit C for  
5 identification, as of this  
6 date.)

7 (Typewritten Response to  
8 Interrogatories was marked as  
9 Respondents' Exhibit D for  
10 identification, as of this  
11 date.)

12 (Cover Sheet for United  
13 States District Court, Eastern  
14 District of New York document  
15 was marked as Respondents'  
16 Exhibit E for identification,  
17 as of this date.)

18 Q Good morning, Mr. Bryant. My  
19 name is Scott Middleton. I represent the  
20 police officers in this matter, Peter Ryan  
21 and John Leddy, both of the Long Beach Police  
22 Department.

23 I am going to ask you some  
24 questions about an incident that occurred and  
25 a lawsuit that resulted from that that you

1                   Lachance Deon Bryant  
2   brought against those two officers. If at  
3   any time you don't understand the question,  
4   let me know, and I'll rephrase it for you.  
5   If you give me the answer to a question, I'll  
6   assume, and the record will reflect, that you  
7   understood the question, and that question  
8   will stand. If at any time that you need to  
9   take a break, you need to speak with the  
10   corrections officer and see if that's okay  
11   with him.

12                   I ask that all of your  
13   responses be verbal and not nods of the head  
14   or shaking of the head or uh-huh or uh-uh,  
15   because it makes it difficult for the  
16   interpreter to interpret what that means, if  
17   not impossible.

18                   Do you understand those  
19   instructions?

20           A        Yes, I do.

21           Q        Did you bring a lawsuit against  
22   Officer Peter Ryan and Officer John Leddy of  
23   the Long Beach Police Department?

24           A        Yes, I did.

25           Q        Is that as a result of



1 Lachance Deon Bryant  
2 something that occurred on December 25, 2016?

3 A Yes.

4 Q Did that occur at approximately  
5 12:30 a.m.?

6 A No. Approximately, in my court  
7 papers, it says 12:45.

8 Q A.m.?

9 A Yes.

10 Q You gave an address of 83 East  
11 Hudson Street in Long Beach. How long had  
12 you resided there before you were  
13 incarcerated?

14 A I live there all my life.

15 Q Who did you live with at the  
16 time?

17 A My grandmother and grandfather.

18 Q What is your grandmother's  
19 name?

20 A Thelma McCray.

21 Q Your grandfather?

22 A William McCray.

23 Q Did anyone else live in the  
24 house at that time? By "at that time," I  
25 mean prior to your incarceration after the



1 Lachance Deon Bryant

2 December 25th event.

3 A She lived there, too.

4 Q What is her name?

5 A Corinthian Strunk.

6 Q Prior to December 25, 2016, had  
7 you been arrested before?

8 A Yes.

9 Q How many times?

10 A Probably like -- I would say  
11 like four or five.

12 Q How many of those arrests were  
13 as a result of allegedly committing  
14 misdemeanors?

15 A One.

16 Q And how many were as a result  
17 of committing felonies?

18 A Well, a lot of my times they  
19 was. One, my first time, was 2004 -- no --  
20 2002. 2002 was my first time. That was  
21 youthful offender.

22 Second time I -- my first time  
23 getting a felony was 2004 -- well, they  
24 sentenced me in 2005, so that was the felony  
25 time.

1 Lachance Deon Bryant

2 And the rest are results of  
3 violation of parole. And I had a case in  
4 2014 that I got arrested, but the charges, I  
5 beat it at the grand jury.

6 Q Did that result in a lawsuit  
7 against the City of Long Beach?

8 A Yes.

9 Q That case was dismissed, right?

10 A Yes.

11 Q Your 2002 arrest, what were you  
12 arrested for?

13 A I was arrested for robbery.

14 Q Did you use a weapon during  
15 that robbery?

16 A No.

17 Q Were you sentenced to anything?

18 A Yes. I was sentenced to six  
19 months, five years probation.

20 Q In the 2004 arrest, what was  
21 that for?

22 A That was for assault.

23 Q Did you use a weapon in the  
24 assault?

25 A Yes.

1 Lachance Deon Bryant

2 Q What type of weapon?

3 A A gun, .25 automatic.

4 Q What type of automatic.

5 A .25.

6 Q Did you shoot someone?

7 A Yes.

8 Q How badly were they injured?

9 A Two shots to the back.

10 Q What were you convicted of?

11 A I was convicted of assault. I

12 can't really say. I don't remember what

13 degree it was, but I know it was assault.

14 Q Was that after a trial or did

15 you plead?

16 A No. I plead. I got five

17 years, five post release.

18 Q You pled in 2005?

19 A Yes.

20 Q Did you serve until 2010?

21 A I served until 2009.

22 Q When you were released, you had

23 to do another five years probation, or was it

24 parole?

25 A Parole.

1 Lachance Deon Bryant

2 Q Is that where the parole  
3 violations took place?

4 A Yes.

5 Q What was the nature of the  
6 parole violations?

7 A The nature of my parole  
8 violation, first one was 2010. I was in a  
9 situation with my friend where I got charged  
10 with assault, a misdemeanor assault.

11 Q Did that occur in Long Beach?

12 A Yes.

13 Q Were you arrested by the Long  
14 Beach Police Department?

15 A Yes.

16 Q What was the next parole  
17 violation?

18 A Absconding. That was -- I got  
19 arrested 2013.

20 Q Was that also in Long Beach?

21 A Yes.

22 Q When was the next parole  
23 violation?

24 A 2014.

25 Q What was that for?

1 Lachance Deon Bryant

2 A That was for not reporting  
3 to -- absconding, they call it.

4 Q Not reporting.

5 As a result of any of those  
6 parole violations, were you sent back to  
7 prison?

8 A All of them.

9 Q For how long?

10 In 2010 how long did you return  
11 to prison?

12 A I did twelve months.

13 Q What about for the 2013, not  
14 reporting?

15 A I had to do -- I went to  
16 Willard. I finished Willard, so I did  
17 fifteen months.

18 Q What about 2014?

19 A Eight months. I was finished.

20 Q Any other arrests, convictions,  
21 or pleas between 2002 and 2016?

22 A Well, I had a DUI, too.

23 Q When was that?

24 A 2015.

25 Q Where were you arrested?

1 Lachance Deon Bryant

2 A Long Beach.

3 Q What were you driving under the  
4 influence of?

5 A I was smoking weed. That is  
6 what they said.

7 Q Were you convicted of that or  
8 did you plead?

9 A I got -- I think they gave  
10 me -- I don't remember what it was. I think  
11 it was like fifth degree. I think they gave  
12 me like possession.

13 Q Fifth degree possession?

14 A Yes.

15 Q They dismissed the other  
16 charges?

17 A Yes. They gave me a fine.

18 Q 2014, the lawsuit that you  
19 brought against the City of Long Beach, what  
20 did you allege happened in that?

21 A They falsely arrested me. Like  
22 it was in Hempstead, New York, and they told  
23 me that I was being arrested for not  
24 reporting to parole. And they really  
25 arrested me for shooting somebody.

1                   Lachance Deon Bryant

2           Q       Did you ever hire an attorney  
3 for any of the lawsuits for the lawsuits  
4 against the City of Long Beach?

5           A       No.

6           Q       And you don't have an attorney  
7 today, right?

8           A       No.

9           Q       You are here pursuant to a  
10 write of habeas corpus that brought you down  
11 from another prison facility?

12          A       Yes.

13          Q       What prison facility is that?

14          A       Five Points Correctional.

15          Q       Before we get to Five Points,  
16 let's talk about the 2004 arrest and  
17 incarceration.

18                   Where were you incarcerated at  
19 that time?

20          A       I went from Washington  
21 Correctional Facility -- Nassau County to  
22 Washington. From Washington I went to Green  
23 BOX. From Greene box I went to Wyoming.  
24 From Wyoming I went to Orleans box. From  
25 Orleans box I went to Elmira. From Elmira I



1                   Lachance Deon Bryant  
2    went to Collins box. From Collins box I went  
3    to Auburn. From Auburn I went to Lakeview.  
4    From Lakeview I went to Attica. From Attica  
5    I came home.

6           Q       After the 2014 arrest and the  
7    -- the 2004 arrest and incarceration, were  
8    you charged with anything while you were in  
9    prison?

10          A       No.

11          Q       Were you ever charged with  
12   prison contraband?

13          A       No.

14          Q       Have you been charged with  
15   prison contraband since this arrest and  
16   incarceration, meaning the 2016?

17          A       No.

18          Q       Did you ever hide a razor blade  
19   in a bar of soap or anywhere else?

20          A       No.

21          Q       Have you had any disciplinary  
22   action while you were in prison, either after  
23   the 2004 arrest or the 2016 arrest?

24          A       Pertaining to what?

25          Q       Anything.

1 Lachance Deon Bryant

2 A You said tickets?

3 Q No. Any sort of disciplinary  
4 actions against you while in prison.

5 A Yes. An assault on staff. I  
6 had a weapons charge.

7 Q What was the weapons charge?

8 A A razor blade being in the top  
9 of the cell, when I was in a double bunk  
10 cell.

11 Q Anything else?

12 A No.

13 Q The razor blade, was that after  
14 the 2004 arrest or the 2016 arrest?

15 A That was during the 2004 arrest  
16 in Auburn Correctional Facility.

17 Q Where was the assault on staff?

18 A That was Cocksackie. I forgot  
19 to say Cocksackie.

20 Q When was that; do you remember?

21 A 2006.

22 Q Where did Cocksackie fall in?

23 A I went from Wyoming to New  
24 Orleans, then I went to Cocksackie. From  
25 Cocksackie I went to upstate box, and then I

1 Lachance Deon Bryant  
2 went to Elmira, and then everything else.

3 Q When were you convicted in  
4 connection with the latest incarceration?

5 A Right now?

6 Q Yes.

7 A Like when did I get sentenced?

8 Q Convicted, sentenced, whatever.

9 Whichever date you remember.

10 A I was sentenced in -- August.

11 August or September.

12 Q Of what year?

13 A 2017.

14 Q Was that the result of a plea

15 or trial?

16 A No. That was a plea.

17 Q What were you -- what did you

18 plead to?

19 A Criminal possession of a weapon

20 in the second and attempted burglary.

21 Q What is your sentence?

22 A Seven years, five years post.

23 Q Seven years, five years post?

24 A Yes.

25 Q Since being incarcerated after

1 Lachance Deon Bryant  
2 your plea in August or September of 2017,  
3 where have you been?

4 A I went to Downstate. From  
5 downstate I went to Clinton. From Clinton  
6 I've been in Five Points. Now I am here for  
7 court.

8 Q Any disciplinary issues with  
9 respect to these three facilities?

10 A I had like talking in the  
11 hallway.

12 Q Anything else?

13 A I had covering my light ticket.

14 Q Covering your light?

15 A Yeah.

16 Q Anything else?

17 A No.

18 Q What is your date of birth?

19 A 3/16/85.

20 Q What is your highest level of  
21 education?

22 A Twelfth grade.

23 Q Where did you go to school?

24 A Long Beach, to BOCES.

25 Q What happen you study at BOCES?

1 Lachance Deon Bryant

2 A I was so bad. I didn't care  
3 about school. I'm not even going to lie to  
4 you.

5 Q Did you graduate?

6 A No. I got arrested.

7 Q That was in 2002?

8 A Yes.

9 Q Have you had any training  
10 during your incarceration, either the present  
11 incarceration or the last incarceration?

12 A I got my -- I got my  
13 certificate in -- I am a carpenter's helper.

14 Q When did you get that?

15 A I got that 2007, in Elmira.

16 Q Have you had any jobs while you  
17 have been incarcerated?

18 A No.

19 Q They haven't given you any  
20 tasks to do or assigned you to anything?

21 A Nope.

22 Q Other than the two lawsuits  
23 that you told me about against the City of  
24 Long Beach, have you been involved in any  
25 other lawsuits?

1 Lachance Deon Bryant

2 A No.

3 Q Have you ever been in the  
4 military?

5 A No.

6 Q Prior to your arrest in 2016,  
7 were you working?

8 A Yes.

9 Q Where were you working?

10 A I was working in Minnesota for  
11 a construction company called Calgaro  
12 Construction.

13 Q What city in Minnesota?

14 A Avon.

15 Q When did you move to Minnesota?

16 A I moved to Minnesota in 2016.

17 Q Where were you living?

18 A I was living in Avon,  
19 Minnesota.

20 Q What was the address?

21 A I don't know. I don't remember  
22 that address.

23 Q Who were you living with?

24 A I was living with my boss,  
25 Jeremy Calgaro.

1 Lachance Deon Bryant

2 Q How do you know Jeremy?

3 A I met him in Long Island. He  
4 was working at We Built. We did work on the  
5 Presbyterian church that they have, the new  
6 one that was just built.

7 Q The Presbyterian church?

8 A Yes. I met him through my God  
9 sister's daughter's father.

10 Q God sister's daughter's father?

11 A Yes, God sister's daughter's  
12 father.

13 Q Was he from Minnesota or from  
14 Long Island?

15 A No. He is from Minnesota.

16 Q And you moved out there to work  
17 for him?

18 A Yes.

19 Q How long did you work for him?

20 A I worked for him from January  
21 to August.

22 Q 2015?

23 A 2016.

24 Q Is that how long you lived in  
25 Minnesota?



1 Lachance Deon Bryant

2 A Yes.

3 Q Why did you leave?

4 A Because I had a situation with  
5 my son's mom where I had to come back. She  
6 was trying to keep my son away from me, and I  
7 wasn't -- I'm not that type of person that my  
8 son means everything to me, so I had to come  
9 back in order for me to help him grow up.

10 Q Your son's name is Chase?

11 A Chance.

12 Q Chance?

13 A Chance.

14 Q How old is Chance?

15 A Six years old.

16 Q Who does he live with now?

17 A He lives with his mom.

18 Q What is her name?

19 A Antonia Darwin.

20 Q Other than Chance, do you have  
21 any other children?

22 A No.

23 Q Where does Antonia live?

24 A She lives in the Bronx.

25 Q Do you know her address?

1 Lachance Deon Bryant

2 A Yeah.

3 Q What is the address?

4 A I don't feel comfortable giving  
5 it to you, to be honest.

6 Q What section of the Bronx?

7 A She lives in Gun Hill.

8 MR. MIDDLETON: Off the  
9 record.

10 (A discussion was held off  
11 the record.)

12 Q You have three brothers or  
13 sisters?

14 A Yes.

15 Q Where do they live, Long Beach?

16 A No. Hempstead. One lives in  
17 Long Beach, one lives in Florida, and one  
18 lives in Suffolk.

19 Q The night or early morning that  
20 you were arrested, where were you before you  
21 got arrested?

22 A I was in Queens.

23 Q Were you at some sort of a  
24 holiday or Christmas thing with family?

25 A Yes. I was with my son, my

1 Lachance Deon Bryant

2 girl and her son.

3 Q Do you have any custodial  
4 rights to your son now?

5 A Custodial rights to him?

6 Q Do you have custody at all or  
7 has it been terminated?

8 A Nobody has custody. We never  
9 went to -- I never been to court about him.

10 Q Are you still dating this girl?

11 A Which one?

12 Q The one that you were with the  
13 night that you were arrested?

14 A Yes.

15 Q What is her name?

16 A Shakima Owens.

17 Q Does she live in Long Beach or  
18 Queens?

19 A She lives in the Bronx.

20 Q How old is her son?

21 A Her son is going to be six  
22 tomorrow.

23 Q Where were you in Queens?

24 A I was in Richmond Hill.

25 Q Were you at a house or an

1 Lachance Deon Bryant

2 apartment?

3 A A house.

4 Q Whose house?

5 A Her house.

6 Q Shakima's?

7 A Yes.

8 Q She lived in Queens at the  
9 time?

10 A Yes.

11 Q What time did you leave Queens?

12 A I left Queens around like  
13 11:30.

14 Q Do you remember the address  
15 that she lives in in Richmond Hill?

16 A I forgot. I forgot the  
17 address.

18 Q Do you remember the street?

19 A 113th and Jamaica Avenue.  
20 113th and Jamaica Avenue.

21 Q So you left around 11:30.  
22 Where did you go from there?

23 A I went to 111th Street, got on  
24 the J train, went to Queens station, bought a  
25 ticket for Long Beach.

1 Lachance Deon Bryant

2 Q So you went to Jamaica station?

3 A Yes.

4 Q Jamaica to Long Beach?

5 A Yes.

6 Q Do you remember what train you  
7 caught?

8 A What time?

9 Q Yes.

10 A No.

11 Q How long is the train ride from  
12 Jamaica to Long Beach?

13 A I would say probably like close  
14 to an hour. I don't know. Forty-five  
15 minutes, probably.

16 Q Okay.

17 A Maybe.

18 Q Do you know a Cynthia Betty?

19 A Yes. My aunt.

20 Q She lived in Long Beach?

21 A Yes.

22 Q When you say it's your aunt,  
23 who is she related to?

24 A My father's sister.

25 Q Getting back to your

1 Lachance Deon Bryant  
2 grandparents that you live with you, are they  
3 on your mother's side or father's side?

4 A My mother's parents.

5 Q Is your father still alive?

6 A Yes.

7 Q Where does he live?

8 A With her.

9 Q He lives with your aunt?

10 A Yes.

11 Q What is your father's name?

12 A Howard Bryant.

13 Q Is your mother still alive?

14 A Yes.

15 Q What is her name?

16 A Valerie Strunk.

17 Q Does she live in Long Beach or  
18 somewhere else?

19 A No. She lives in Hempstead.

20 Q Hempstead, okay.

21 Had you been to visit either  
22 your father or your aunt just before you were  
23 arrested?

24 A I went -- I visited my aunt.

25 Q Was your father at home at that

1 Lachance Deon Bryant

2 time?

3 A No.

4 Q What time did you get to her  
5 house?

6 A I had to get there at least  
7 like 12:30.

8 Q In Long Beach does she live?

9 A She lives 31 Birch Court.

10 Q Where is Birch Court in  
11 relation to the train station, city hall,  
12 et cetera?

13 A Precisely like two,  
14 three-minute walk. It is right there. It is  
15 Channel Park Homes.

16 Q How long did you stay at your  
17 aunt's house?

18 A Roughly, like I'd say the  
19 longest, maybe ten minutes.

20 Q She was home?

21 A Yes.

22 Q Did you have any discussion  
23 with her?

24 A Yep. Yes.

25 Q What did you talk about?



1 Lachance Deon Bryant

2 A I talked to her about her lying  
3 to people, telling people that I did  
4 something to them. And we started arguing,  
5 and I pulled out a gun on her. Because she  
6 had me so mad, like, so I threatened her  
7 life.

8 Q You were carrying weapons at  
9 the time?

10 A Yes, I was.

11 Q How many?

12 A I had two guns.

13 Q Did you have any other weapons?

14 A No.

15 Q Did you pull both guns out?

16 A Yep.

17 Q Were they both handguns?

18 A Yes.

19 Q Was one an automatic?

20 A Yes.

21 Q Was one a revolver?

22 A Yes.

23 Q You threatened to kill her?

24 A I didn't threaten to kill her.

25 I told her that -- I told her, you got people

1                   Lachance Deon Bryant  
2    out here talking about me. Like she told one  
3    of my friends something and the whole word  
4    around the town was someone was trying to  
5    kill me now.

6                   So I am letting her know, you  
7    see what the fuck you did. Look at what you  
8    did. You got people coming after me  
9    discussing my name, and I never told you  
10   anything from -- to say anything about me.

11                  Like I was mad. Like I put in  
12   fear because she had my life on the line,  
13   like. I wanted to do something to her. I  
14   would have did it. I am not playing. If I  
15   wanted to kill her, I would have killed her.

16                Q       So you just wanted to scare  
17   her?

18                A       Yes. I wanted to let her know,  
19   look what she did. She put my life in  
20   jeopardy over nothing, when I am doing good  
21   for myself and you are bringing my name up.  
22   And the word around the town was somebody  
23   wanted to kill me. So nobody is going to  
24   kill me. I will kill you first, most  
25   definitely.

1 Lachance Deon Bryant

2 Q And how long did this argument  
3 or interaction last?

4 A I would say it was like two  
5 minutes.

6 Q After that two minutes, did you  
7 leave?

8 A Yes.

9 Q Where did you go?

10 A I was going back home.

11 Q How far away did you live from  
12 where your aunt lived?

13 A I would say like a  
14 fifteen-minute walk.

15 Q Did you come to learn that your  
16 aunt called the police about the incident?

17 A I found out once I got to the  
18 train station, that I knew that she called  
19 the police.

20 Q How did you find out?

21 A The police know me, and when I  
22 was walking, they seen me and was, like,  
23 Chance, and I am like -- I looked and I  
24 started running.

25 Q Do you remember the police

1 Lachance Deon Bryant

2 officer that called out your name?

3 A No, I don't remember who it  
4 was.

5 Q Did that police officer draw  
6 his weapon?

7 A I didn't see the police  
8 officer.

9 Q When you ran, where did you run  
10 to?

11 A I ran through the train  
12 station, and -- I ran through the train  
13 station, I ran through the taxi stand, and as  
14 I was running through the taxi stand, I hit  
15 between two taxis, and then I was trying to  
16 make it to the sidewalk on the side where the  
17 taxi is at, and as I was trying to make it to  
18 the taxi -- I mean to the sidewalk, the  
19 officers came and hit me with the car.

20 Q Let's take that one step at a  
21 time.

22 Okay?

23 A All right.

24 Q So you ran from the initial  
25 police officer when he called your name?

1 Lachance Deon Bryant

2 A Yes.

3 Q Did he tell you to stop?

4 A No. He just said Chance, and  
5 I -- like I already know what time it is,  
6 like I already know what is going on, so I  
7 know I got guns on me. I am, like, shit. I  
8 knew that she called the cops on me. I  
9 already felt it, like, because my brother and  
10 them was there with her. So I knew that.  
11 Like when I was leaving, I heard her saying  
12 something like, I am calling the police. But  
13 I am thinking to myself, I didn't do nothing  
14 to you. You deserve that, like dead, as I  
15 don't care how you feel. You deserved this.  
16 My life is in danger now. I put you in a  
17 position where you felt your life was in  
18 danger, so I ran off, I walked off.

19 And I walked and I got to the  
20 train station right underneath where the bus  
21 is at. The officer was coming right after  
22 out the police station.

23 Q What were you wearing?

24 A I was wearing a burgundy  
25 hoodie, burgundy coat, blue jeans, blue denim

1 Lachance Deon Bryant

2 jeans with burgundy underneath them, and  
3 black sneakers.

4 Q The burgundy coat, was it a  
5 leather coat?

6 A No. A flight jacket.

7 Q You said that your brothers  
8 were at your aunt's house?

9 A One of my brothers.

10 Q Which one?

11 A Robert Stockdale.

12 Q Was anyone else at your aunt's  
13 house?

14 A Yes. Her son Cedrick Ward and  
15 his son, Isaiah. I don't know if his last  
16 name is Ward or -- what his last name is, but  
17 Cedrick's son.

18 Q Anyone else?

19 A I didn't see nobody else. If  
20 somebody was there, like, I didn't.

21 Q The weapons that you pulled out  
22 while you were at your aunt's house, were  
23 they loaded?

24 A Like they didn't have -- they  
25 had bullets in it, but...

1 Lachance Deon Bryant

2 Q They did or didn't?

3 A They did have bullets in it.

4 Q The automatic had a clip?

5 A Yes.

6 Q How many clips did you have  
7 with you?

8 A One clip.

9 Q After the police officer called  
10 your name and you began to run, did you drop  
11 the clip?

12 A No. I threw the whole gun.  
13 One -- actually, when I was running, one of  
14 the guns fell like that (indicating). It's  
15 the one with the clip, but it fell right  
16 where I started running at.

17 Q Where were you carrying the  
18 gun, the one that fell?

19 A On my waist.

20 Q What about the other gun?

21 A Both. It was in my waist, too.

22 Q Was the revolver in any type of  
23 holster?

24 A Yes.

25 Q You said you ran through the



1 Lachance Deon Bryant  
2 train station where the taxi stand is?

3 A Yes. The taxi stand is  
4 connected to the train station.

5 Q Did you try to hide between a  
6 couple of taxis that were parked?

7 A I did hide between two of them.

8 Q As you are facing city hall,  
9 are the train tracks to the right or to the  
10 left?

11 A Facing city hall, like city  
12 hall is where you are at, the tracks is where  
13 I am at, so where this is the police station,  
14 the train tracks is on this side, this way  
15 (indicating).

16 Q Were you behind city hall?

17 A I was in front of city hall.

18 Like city hall is here, and I  
19 was here (indicating). Like I came from this  
20 way (indicating). I was here, this is the  
21 police station door (indicating). And as I  
22 got directly right there, soon as I walked  
23 through under the tunnel and they can see me,  
24 they called me right there. They was just  
25 waiting. I don't know if he came out on the

1 Lachance Deon Bryant

2 call or whatever it was, but some reason I  
3 got under there and they seen me, like they  
4 already know, they know me.

5 So as soon as I got under  
6 there, and she was telling them where I was  
7 going, anyway, I'm pretty sure, because  
8 directly from where I was walking, like she  
9 can watch me walk -- like, literally, I can  
10 walk and walk, and she can just watch me and  
11 know like he is coming right there. I  
12 already knew that she told them that I was  
13 coming this way.

14 Q How long were you hiding  
15 between the taxis?

16 A Give or take, it wasn't no less  
17 than ten seconds.

18 Q When you left that hiding spot,  
19 did you run, did you walk, or something else?

20 A No. I ran out.

21 Q How far away was the sidewalk  
22 that you were trying to get to?

23 A I would say like this table  
24 length.

25 Q The entire table?

1 Lachance Deon Bryant

2 A No. Like --

3 Q Just one table?

4 A Just this one table.

5 Q About ten feet?

6 A Yeah.

7 Q In that ten feet is when you  
8 were hit by the police car?

9 A Yes.

10 Q Before you started to run from  
11 the taxis, did you look to see if there was  
12 any traffic coming?

13 A It wasn't. Like I -- I didn't  
14 see. They had their lights off. Like it  
15 wasn't literally -- it was a car -- it was a  
16 car, like, parked at the side, and as soon as  
17 I stepped out, like, because, you know, I am  
18 looking back worrying, I know I got an  
19 officer on me, behind me, so as soon as I  
20 looked back, I knew he wasn't there. I  
21 checked as soon as I was running out. Like  
22 the car was coming with no lights on and the  
23 officer was hanging out the window, like.

24 Q So you looked behind you to see  
25 if the police officer was still following

1 Lachance Deon Bryant

2 you?

3 A Yes.

4 Q So as you were looking behind,  
5 you were walking forward or running forward?

6 A I was like crouched down. I  
7 was looking back. And as I was looking back,  
8 I started to run forward out from the back of  
9 the taxi to get on the sidewalk because I  
10 know if I had gotten on the sidewalk, I know  
11 they gonna caught me.

12 Q How far from the front of the  
13 taxi were you when you got hit?

14 A From the front of the taxi?

15 Q Yes.

16 A I was behind the taxi, so I  
17 was -- the car was in front -- the front of  
18 the car was at the rear.

19 Q All right.

20 So you were hiding somewhere  
21 around the front of the car?

22 A I was hiding like in the  
23 middle, like in between. In between. I  
24 would say where the sliding door is at.

25 Q So when you ran, you ran toward

1 Lachance Deon Bryant

2 the rear of the taxi because it was parked  
3 head in?

4 A Yes.

5 Q How far from the rear of the  
6 taxi, then, did you get before you got hit by  
7 the police car?

8 A I maybe got like three steps.

9 Q How fast were you running?

10 A Well, I just took off. It  
11 wasn't -- it was just like -- I tried to  
12 get -- to gain speed to get to the sidewalk  
13 so I don't -- I didn't. I wasn't running  
14 that fast.

15 Q So you got up, you started to  
16 run, took about three steps, and you got hit?

17 A Yeah.

18 Q How fast are you?

19 A I am a fast runner.

20 Q In addition to being a fast  
21 runner, are you able to accelerate pretty  
22 quickly when you run?

23 A Yes, normally.

24 Q Did the police car come from  
25 your left or your right?

1 Lachance Deon Bryant

2 A It came from my right.

3 Q Were you trying to run directly  
4 across the street or at an angle or something  
5 else?

6 A It wasn't -- it wasn't the  
7 street. I was like -- how can I say it?  
8 Like it wasn't nowhere in the street. It was  
9 like -- like this is the street right here,  
10 this is like where the cars park at, they are  
11 allowed to park, and first it is a sidewalk,  
12 then there are cars where there is parking.  
13 You know what I mean? It wasn't like -- I  
14 wasn't in the street.

15 Q So it was a parking area for  
16 the cabs?

17 A Yes.

18 Q But you can drive cars in front  
19 of the cabs, right?

20 A Yes -- no, you can't drive cars  
21 in front of the cabs, not at all.

22 Q Well --

23 A Because it's taxi.

24 Q At the rear of the cabs?

25 A No. In that area where I was

1                   Lachance Deon Bryant  
2   hit at, you can't drive there. It is  
3   nothing. It is like a little -- there used  
4   to be a garbage -- like where they crush the  
5   garbage at. It used to be one of those  
6   things there. But it was moved. It is just  
7   behind it. It is like -- it is basically  
8   like the red -- it is a gate that is  
9   protecting for people not to go on the  
10  tracks.

11           Q       You were flung the opposite  
12  direction from the train, right?

13           A       In opposite direction.

14           Q       You weren't running towards the  
15  train tracks, you were running away from the  
16  train tracks?

17           A       Yes.

18           Q       But there are vehicles that  
19  drive in that area, the cabs drive there?

20           A       Yes.

21           Q       The cabs drive there?

22           A       Yes.

23           Q       Other vehicles drive in that  
24  area?

25           A       Yes.

1 Lachance Deon Bryant

2 Q The police came from your right  
3 when you --

4 A The police came like -- if I am  
5 running this way, the police was coming  
6 directly off of Park Place. Park Place --  
7 Park Place -- like they was coming from  
8 towards Marcus Street.

9 So they was coming up Park  
10 Place towards Marcus Street. I don't know  
11 where he was coming from, to be honest. I  
12 just know it was coming from that direction.

13 Q You had an idea they were  
14 looking for you?

15 A I know they was looking for me.  
16 I didn't -- I knew the police behind me was  
17 looking for me. I didn't know there was a  
18 car coming. I didn't know that the police  
19 officers -- I didn't know they had a direct  
20 hit on me, like from coming at that angle.

21 Q You weren't paying attention to  
22 the car, you were paying attention and  
23 looking at the police officers that were  
24 running up behind you?

25 A Basically.



1 Lachance Deon Bryant

2 Q Did you see the car at all  
3 before it hit you?

4 A Yes. The reason I seen it,  
5 because the officer was directing him, like  
6 Leddy was directing them. I know them. So I  
7 seen him hang out the window, and he was  
8 telling them, like, left, left, left, and it  
9 wasn't no accident at all, like.

10 Honestly, it wasn't no accident  
11 what they did, like even though I got guns on  
12 me.

13 MR. MIDDLETON: Move to  
14 strike those portions that are  
15 not responsive.

16 Q There is no question with  
17 respect to what they did. I'm still asking  
18 you how it happened. So we'll get to the  
19 next part, though. Okay?

20 For how long a period of time  
21 did you see the police car before it made  
22 contact with you?

23 A Like two seconds.

24 Q Did you do anything to get out  
25 of the way of the police car?

1 Lachance Deon Bryant

2 A I jumped to the left.

3 Q When you jumped to the left,  
4 did the car strike you?

5 A Yes.

6 Q What part of the car struck  
7 you?

8 A The front right end.

9 Q Right, meaning passenger side?

10 A Yes, the passenger side.

11 Q What part of your body did it  
12 strike?

13 A It hit my legs and -- it hit my  
14 whole body, like. I don't really know what  
15 went on because it was that fast and it was  
16 over.

17 Q Did your body then strike the  
18 windshield of the police car?

19 A My face hit it.

20 Q Do you have a driver's license?

21 A Yes.

22 Q How long have you been driving?

23 A I've been driving since 2009 --  
24 well, I've been driving before that. Like I  
25 had a license since 2009, but I was driving

1 Lachance Deon Bryant

2 before that. I've been driving since I was  
3 sixteen.

4 Q In the two seconds that you saw  
5 the car before it hit you --

6 A Um-hum.

7 Q -- were you able to determine  
8 its speed?

9 A No. But I know it was fast.

10 Q You know it was fast, but you  
11 only saw it for two seconds?

12 A Yes.

13 Q After you were struck, did you  
14 feel pain in any part of your body?

15 A My whole body was numb. Like  
16 my face was the most crucial part, though.

17 Q After you were struck, did the  
18 police restrain you in any way?

19 A I know they just -- like he put  
20 his foot on my back and told me to stay down,  
21 like telling me to stay down.

22 Q After your face hit the  
23 windshield, you rolled off the front of the  
24 car?

25 A I don't know. I can't tell you

1 Lachance Deon Bryant

2 what happened.

3 Q Were you on the ground when the  
4 police officer put his foot on your back?

5 A Yes.

6 Q Did the police officer handcuff  
7 you?

8 A Yes.

9 Q Do you know if the police car  
10 hit anything other than you?

11 A Yes. It hit the taxis, too.  
12 It hit the right one, the taxi first on the  
13 street.

14 Q Did you see it hit the taxi, or  
15 did you know it hit the taxi after the  
16 incident occurred?

17 A No, I didn't see it hit the  
18 taxi. I noticed after it occurred.

19 Q By the way, have you seen any  
20 videotapes of this?

21 A I mean a videotape of me, like.  
22 It didn't show, like, the police, the vehicle  
23 and the taxi, because they didn't give me  
24 that tape. They didn't give me that camera  
25 angle.

1 Lachance Deon Bryant

2 Q Who did that tape?

3 A Well, they told me -- well, my  
4 private investigator, Donald Samone, told me  
5 that the precinct -- mine, the precinct --  
6 the taxi stand said that that camera angle  
7 where I was hit at wasn't working, it was  
8 down, that they had a work order in for it.

9 Q So did you ever see any  
10 videotapes of the area at the time that the  
11 accident or incident occurred?

12 A Yes.

13 Q What tapes did you see?

14 A I seen tapes of the front of me  
15 running fast, the front of the taxi stand. I  
16 seen tapes of the taxi, like they -- it just  
17 shows like inside the taxi area where you are  
18 going, and orders of the taxis, and seen the  
19 upper camera that they have, and it shows  
20 just me laying on the ground and the officer  
21 putting his foot on my back, and that is it.  
22 It doesn't show --

23 Q That was all from the taxi  
24 stand?

25 A Yes.

1 Lachance Deon Bryant

2 Q No body cams or dash cams with  
3 the police officers that you know of?

4 A No.

5 If there was, like, I never got  
6 it.

7 Q You were arrested that  
8 evening --

9 A I was arrested.

10 Q -- or morning --

11 A Yes, morning.

12 Q -- I should say?

13 A Yes.

14 Q Were you taken to a hospital?

15 A I was taken to South Nassau  
16 Communities Hospital.

17 Q That is in Oceanside?

18 A Oceanside, New York.

19 Q Were you taken to the emergency  
20 department?

21 A Yes.

22 Q Did they treat you?

23 A Yes.

24 Q Did they admit you?

25 A Yes.

1 Lachance Deon Bryant

2 Q How long were you admitted for?

3 A I stayed there for three days.

4 Q When you got there, did you  
5 tell them what was hurting?

6 A I don't really remember.

7 Q Did you make complaints about  
8 your foot?

9 A Yes.

10 Q What foot?

11 A My right foot.

12 Q Did they X ray it?

13 A Yes.

14 Q Did they tell you that you had  
15 a broken bone in your foot?

16 A They told me it was fractured.

17 Q What other injuries did you  
18 complain about?

19 A Chest pain, and my mouth and  
20 head, my head.

21 Q Did you lose your two front  
22 teeth as a result of this accident?

23 A Yes.

24 Q Was your head bleeding?

25 A Yes.

1 Lachance Deon Bryant

2 Q Did you get any stitches?

3 A No.

4 Q Did you have any portion of  
5 those teeth extracted, or were they  
6 completely knocked out in the accident?

7 A No. I had one-half, like a  
8 little piece of it was extracted, and --

9 Q Was that at the hospital?

10 A No. That was recently. That  
11 was -- I can't -- I don't remember what month  
12 it was, but that was just recently. I just  
13 went out to the hospital and got it done.

14 Q While you were in Five Points?

15 A In Five Points.

16 Q Did they tell you any other  
17 fractures or injuries that you had other than  
18 the fractured bone in your foot?

19 A No.

20 Q I am going to show you an  
21 exhibit that has been marked Exhibit A of  
22 today's date. Now I want to ask you to take  
23 a look at this document, and then I will ask  
24 you some questions about it.

25 Okay?



1 Lachance Deon Bryant

2 A All right.

3 Q Just flip through those pages.  
4 Do you recognize that document?

5 A Yes.

6 Q Is that the Complaint that you  
7 filed in this --

8 A Yes.

9 Q -- lawsuit?

10 A Yes.

11 Q Do you see on the page that is  
12 numbered four --

13 A Yes.

14 Q -- where it says facts?

15 A Where it says what?

16 Q Facts. Up at the top.  
17 Do you see that?

18 A Yes.

19 Q Do you see where you wrote  
20 that? Is that in your handwriting?

21 A Yes.

22 Q Do you see where you wrote down  
23 officer took out his weapon?

24 A Yes.

25 Q Do you remember an officer

1 Lachance Deon Bryant

2 taking his weapon out?

3 A Like I -- it was from a  
4 distance, but like it was -- I was running.

5 Q So you are not really sure if  
6 he took out his weapon?

7 A Yeah.

8 Q You are not really sure?

9 A Yes, I'm not really sure.

10 Q In any of the other  
11 confrontations that you had with Long Beach  
12 Police, did they ever draw their weapons on  
13 you?

14 A Yes.

15 Q When?

16 A It was 2010, in front of my  
17 house.

18 Q Was that for parole violation?

19 A No. It was just a regular  
20 stop. Like they stopped me and -- because  
21 they say -- like they say I always have gun  
22 on me.

23 Q When they stopped you that  
24 time, did you have any guns?

25 A No.

1 Lachance Deon Bryant

2 Q Did you start a lawsuit as a  
3 result of that stop?

4 A No.

5 Q The guns that you had the night  
6 or the morning that you were arrested, were  
7 they legal weapons or illegal weapons?

8 A You mean like --

9 Q Were you licensed to carry a  
10 gun?

11 A No.

12 Q Did any of the police officers  
13 during the confrontation on December 25, 2016  
14 ask you to stop?

15 A Yeah.

16 Q Did you follow that  
17 instruction?

18 A No.

19 Q As a result of that  
20 instruction, you kept running?

21 A Yes.

22 Q When you were running and  
23 eventually hiding, you knew that the police  
24 were told that you were armed?

25 A Yes. I don't know that they --

1 Lachance Deon Bryant

2 I don't know. I didn't know that they was  
3 told I was armed, but I am assuming that they  
4 knew that.

5 Q You thought your aunt told them  
6 that you were armed?

7 A Of course.

8 Q You admitted that you were  
9 armed at the time that you were stopped?

10 A Yes.

11 Q They, in fact, found one gun on  
12 you?

13 A Yes.

14 Q And there was another gun  
15 somewhere in the area, at least a clip  
16 somewhere in the area?

17 A Yes.

18 Q Was it a gun or a clip or both?

19 A It was both.

20 Q Did you admit it was yours?

21 A No.

22 Q Let me ask you, was the  
23 automatic a black Bersa?

24 A Black 9.

25 Q Mini?

1 Lachance Deon Bryant

2 A Yes.

3 Q 9 millimeter, right?

4 A Yes.

5 Q Do you know what the serial  
6 number was on that weapon?

7 A No.

8 Q The other one was a .38?

9 A Revolver.

10 Q Was it an Amadeo Rossi?

11 A I am assuming it was. Like  
12 that is what they say it is.

13 Q Did you ever see the guns after  
14 you were arrested?

15 A Yes.

16 Q Who showed you those guns?

17 A The officers that came and  
18 fingerprinted me for DNA form.

19 Q Did you tell the officers those  
20 were the guns you were in possession of  
21 before the arrest?

22 A No.

23 Q When you filled out this  
24 Complaint, which correctional facility were  
25 you in?

1 Lachance Deon Bryant

2 A I was in Clinton.

3 Q Clinton, okay.

4 Did anybody help you fill this  
5 out?

6 A Yes.

7 Q Who helped you fill it out?

8 A His name, like, Tiger.

9 Q Was he another inmate?

10 A Yes.

11 Q You said that you pled guilty  
12 after the arrest in 2016, true?

13 A Yes.

14 Q So there was no trial?

15 A No.

16 Q Was there a grand jury  
17 proceeding?

18 A I didn't go to no grand jury  
19 proceeding.

20 Q Do you know if you were  
21 indicted?

22 A Yes, I was indicted.

23 Q Did you have assigned counsel?

24 A Yes.

25 Q Who was your attorney for the

1 Lachance Deon Bryant

2 2016 arrest?

3 A Laurie Golombeck.

4 Q Do you know where her office  
5 is?

6 A Westbury, New York.

7 Q After your arrest were you in  
8 Nassau County Jail?

9 A Yes.

10 Q Before your plea were you  
11 released from Nassau County Jail?

12 A No.

13 Q How much time were you in  
14 Nassau County Jail before being moved  
15 upstate?

16 A Eight or nine -- eight to nine  
17 months.

18 Q Does that count towards your  
19 time served?

20 A Yes.

21 Q I will show you Exhibit B, and  
22 I ask that you take a look at that document.

23 Did you ever see that document  
24 before?

25 A Yes. I wrote it.

1 Lachance Deon Bryant

2 Q When did you write it?

3 A I can't say that. I don't know  
4 the specific date it was.

5 Q You see on the second page your  
6 signature?

7 A Yes.

8 Q 17A3781, is that your prison  
9 number?

10 A Yes.

11 Q Do you see where you indicate  
12 that you were approached by an officer with  
13 his gun drawn?

14 A Yes.

15 Q You don't actually remember  
16 that, do you?

17 A I do remember it.

18 Q Before you said that you  
19 weren't sure if the officer had his gun  
20 drawn.

21 A I said I am not sure, but I  
22 know the officer there. I know I was  
23 approached by the officer.

24 Q Is this the officer that called  
25 your name?



1 Lachance Deon Bryant

2 A Yes.

3 Q But you never actually saw his  
4 gun drawn?

5 A Like, he -- he -- I don't know  
6 what it was. It could have been  
7 walkie-talkie or whatever it was. He -- I  
8 just know that he had something in his hand.

9 Q You see a little further down  
10 in that statement that you said that you were  
11 stepping from behind these taxis that weren't  
12 parked in the street, and you ran out the  
13 back, and just as you stepped out from behind  
14 these taxis, you saw a vehicle approach with  
15 the lights out?

16 A Um-hum.

17 Q That was that two-second period  
18 of time that you testified to before?

19 A Yes.

20 Q Within that two-second period  
21 of time, the vehicle hit you?

22 A Yes.

23 Q So it was within two seconds of  
24 you stepping out from in between those cars?

25 A Yes.

1 Lachance Deon Bryant

2 Q It was your intention, had the  
3 officer's car not made contact with you, to  
4 keep running --

5 A Yes.

6 Q -- and to avoid an arrest?

7 A Yes.

8 Q And if you made it to the  
9 sidewalk, that they wouldn't have caught you?

10 A I know they wouldn't have  
11 caught me.

12 Q How do you know that?

13 A I am faster than them. They  
14 never catch me. They never caught me before,  
15 never. When I was running, never.

16 Q You have run from the police  
17 before?

18 A Yeah.

19 Q The police officers knew you  
20 ran from them before?

21 A Yes.

22 MR. MIDDLETON: Can I have  
23 that one?

24 Q I will show you what is marked  
25 as Exhibit C. I ask that you take a look at

1 Lachance Deon Bryant

2 that.

3 Do you remember preparing these  
4 answers?

5 A Yes.

6 Q Those were prepared in response  
7 to questions that my office sent to you,  
8 right?

9 A Yes.

10 Q These answers that you gave are  
11 true?

12 A Yes.

13 Q At least based upon your  
14 recollection of what occurred.

15 A Yes.

16 Q You indicate here that you were  
17 treated by a physical therapist while you  
18 were at Nassau County Jail.

19 A Yes.

20 Q How long did you undergo  
21 physical therapy?

22 A I think I was there -- I think  
23 it was like three or four weeks.

24 Q Was that for your foot?

25 A Yes.

1 Lachance Deon Bryant

2 Q Did you get any dental care  
3 while at the Nassau County Jail?

4 A No, they didn't. They looked  
5 at my mouth, but they didn't do no dental  
6 care. I didn't get dental care until I was  
7 up here.

8 Q When you were having physical  
9 therapy at the jail, how often would you have  
10 those physical therapy visits or appointments?

11 A I get it once a week.

12 Q What injuries are you claiming  
13 occurred as a result of this accident?

14 A I had head trauma, my teeth  
15 knocked out, and fractured foot.

16 Q When you were in the hospital  
17 for the three days, did they cast your foot?

18 A No.

19 Q Did they put it in any kind of  
20 boot?

21 A Yes, put it in a boot.

22 Q How long did you wear the boot  
23 for?

24 A Wore the boot for like a month.

25 Q That month that you were at the

1 Lachance Deon Bryant

2 Nassau County Jail the entire time --

3 A Yes.

4 Q -- were you able to take it off  
5 to shower?

6 A Yes.

7 Q Did you get the boot at the  
8 hospital or somewhere else?

9 A I got the boot at the hospital.

10 Q Other than the physical therapy  
11 and wearing the boot, did you get any  
12 treatment for your foot at Nassau County  
13 Jail?

14 A No.

15 Q Did you get any treatment for  
16 your lacerations to your head at the Nassau  
17 County Jail?

18 A Well, they wasn't -- they --  
19 they, like, wiped it off and stuff like that.

20 Q Did you have bandages on it or  
21 something else?

22 A No, I didn't have no bandage.  
23 It was just scabs.

24 Q What parts of your head were  
25 cut?

1 Lachance Deon Bryant

2 A Right here (indicating).

3 Q Indicating in the hairline,  
4 about two inches above the hairline on the  
5 left side.

6 A Yes.

7 Q Did they give any sort of  
8 ointment to put on that?

9 A No.

10 Q Were you prescribed any  
11 medications after you left the hospital?

12 A No. They gave me -- they gave  
13 me antibiotics.

14 Q Did they give you ibuprofen?

15 A Yes.

16 Q How long did you -- for how  
17 long a period of time did you take the  
18 antibiotics?

19 A I took the antibiotics every  
20 day.

21 Q Since being incarcerated either  
22 at Nassau County Jail or Five Points or at  
23 the Clinton facility, have you sought any  
24 psychiatric or psychological treatment?

25 A No, I don't -- no.

1 Lachance Deon Bryant

2 Q Have you asked for any  
3 psychiatric or psychological treatment?

4 A No.

5 Q I will show you what is marked  
6 as Exhibit D. Take a look at that document.

7 A Yes.

8 Q Was that document prepared in  
9 response to the questions that my office sent  
10 you?

11 A Yes.

12 Q That was rejected by the court,  
13 true?

14 A That was rejected.

15 Q Yes?

16 A No. I didn't ever have no  
17 documents that said it was rejected.

18 Q I will show you what has been  
19 marked E of today's date. It is a cover  
20 sheet from the United States District Court  
21 for the Eastern District of New York.

22 Can you take a look at that.

23 Do you ever recall seeing a  
24 document like that?

25 A What, this right here?

1 Lachance Deon Bryant

2 Q Yes.

3 Did you ever see that document  
4 before?

5 A I'm not sure. I don't  
6 remember. I was sent a lot of different  
7 documents.

8 Q Do you remember why you would  
9 have sent a typed up response to my office's  
10 questions and then a handwritten response to  
11 my office's questions?

12 A Because I wasn't sure like how  
13 I was supposed to proceed with the whole  
14 thing. Like I wrote, and then I thought it  
15 would be -- I was getting help, and somebody  
16 told me it would be better for me typing it.

17 Q In the typed up version of your  
18 responses, do you see where number 16 is  
19 listed on the first page?

20 A Yes.

21 Q It indicates that you were  
22 earning eight hundred to a thousand dollars  
23 per week.

24 A Yes.

25 Q Where were you making that



1 Lachance Deon Bryant

2 money? Was that in Minnesota?

3 A Yes.

4 Q So at the time that you were  
5 involved in the accident with the police car,  
6 December 25, 2016, you weren't making that  
7 eight hundred to a thousand a week, true?

8 A Yes, I was.

9 Q You indicated before that you  
10 came back from Minnesota sometime in August  
11 or September of 2016, true?

12 A True.

13 Q Did you return to Minnesota  
14 between August and December?

15 A No. But I was doing plumbing  
16 with my friend David.

17 Q So it was with a different  
18 company or different person that you were  
19 making eight hundred to a thousand a week?

20 A Yes. It was with a different  
21 guy.

22 Q Local guy?

23 A Yes.

24 Q Long Beach?

25 A Yes.

1 Lachance Deon Bryant

2 Q What is his name?

3 A David Paller.

4 Q Pallor, P-A-L-L-O-R, or --

5 A L-E-R.

6 Q L-E-R, okay.

7 Does he have his own business?

8 A No. He works for his boss, so  
9 we was doing like -- he had -- he worked with  
10 his boss, and his boss had him -- like if he  
11 would call him, and he just go do like local  
12 jobs in the neighborhood, help fix people's  
13 plumbing.

14 Q Aside for working for his boss,  
15 he did side jobs?

16 A Yes.

17 Q That is when he called you?

18 A Yes.

19 Q Did he pay you in check or  
20 cash?

21 A We got cash.

22 Q How many days a week were you  
23 working to earn this eight hundred to a  
24 thousand?

25 A Maybe three or four days a

1 Lachance Deon Bryant

2 week.

3 Q So the average then was \$900  
4 per week?

5 A Yes. Like we get two hundred a  
6 job. That is what he gave me.

7 Q His name was David Paller?

8 A Yes.

9 Q What is his address?

10 A He live at 24 Oak Court.

11 Q How long a period of time did  
12 you work for him?

13 A I worked for him for like -- I  
14 would say like maybe three months, four  
15 months.

16 Q Were you earning the amount of  
17 money he paid you, between eight hundred and  
18 a thousand, every week for that entire time?

19 A Yes.

20 Q You worked three to four days a  
21 week with him?

22 A Yes.

23 Q When you say three to four days  
24 a week, do you mean just a couple of hours a  
25 day?

1 Lachance Deon Bryant

2 A He had like -- depending on how  
3 long it take us to do the job. We do like  
4 sinks, like showers, re-routing, doing other  
5 things like in -- like going through the  
6 ceiling and taking stuff out and putting in.  
7 What do you call it? I forgot the name of  
8 the objects. But like where you just cast up  
9 everything and do different things.

10 Q He paid you out of his pocket?

11 A Yes.

12 Q Is it your claim that the  
13 officers used excessive force before they  
14 arrested you, after they arrested you, or  
15 both?

16 A They used excessive force both.

17 Q Is it your claim that the  
18 excessive force before your arrest was  
19 striking you with a car?

20 A Yes.

21 Q You didn't hear the police  
22 officer say that it was an accident at the  
23 scene?

24 A That it was an accident at the  
25 scene?

1 Lachance Deon Bryant

2 Q Yes.

3 A No.

4 Q What force did they use and how  
5 was it excessive after the accident occurred?

6 A Because they just keeping their  
7 feet on me. Like I am already down, I'm  
8 already hit. I can't move. Like there is no  
9 reason for you to keep putting your foot on  
10 me, telling me to stay down. That doesn't  
11 make any sense at all.

12 I don't see the sense it makes.  
13 A person is down, hit by a car, struck  
14 already, what does it make sense for you to  
15 put your foot on me, like keep telling me  
16 like -- like this, stay down, stay down?  
17 Like I am staying down. There is no need for  
18 you to keep putting your feet on me at all.  
19 Like it doesn't make any sense. That is  
20 excessive force. Why do you have to put your  
21 foot on me? I am already down.

22 Q At the time that they had their  
23 foot on your back, had they frisked you yet?

24 A No, they didn't frisk me yet.

25 Q They did frisk you, though,

1 Lachance Deon Bryant

2 before they put you in the police car?

3 A They never put me in a police  
4 car.

5 Q You went in an ambulance?

6 A Ambulance.

7 Q Did they frisk you before they  
8 put you in the ambulance?

9 A Yes.

10 Q Did they find any other weapons  
11 or contraband?

12 A Yes. A weapon. I had a .38  
13 revolver on me.

14 Q Did they find anything else,  
15 any sort of -- any other type of weapon or  
16 drugs?

17 A No.

18 Q You state they deprived you of  
19 your Eighth Amendment Rights. How did they  
20 deprive you of your Eighth Amendment Rights?

21 A In that subject, like somebody  
22 was helping me, I don't even -- I asked  
23 somebody to help me write the lawsuit, so...

24 Q So with respect to the  
25 handwritten answers to the questions that my

1 Lachance Deon Bryant

2 office gave you --

3 A Um-hum.

4 Q -- Exhibit C, somebody helped  
5 you answer those questions?

6 A No. I did those on my own.

7 Q The typewritten ones in front  
8 of you now as Exhibit D, did someone help you  
9 with those answers?

10 A Yes.

11 Q Who helped you?

12 A K.

13 Q Is that another inmate?

14 A Yes.

15 Q Where was that?

16 A Five Points.

17 Q Do you have K.'s last name?

18 A No.

19 Q How is it that you claim your  
20 Fourteenth Amendment Rights were violated?

21 A To be honest, I don't even --

22 Q You don't even know what that  
23 phrase means?

24 A No.

25 Q Are you familiar with the

1                   Lachance Deon Bryant  
2     Eighth and Fourteenth Amendments to the U.S.  
3     Constitution?

4           A       No.

5           Q       Are you familiar with any  
6     sections of the New York State Constitution  
7     that you say were violated?

8           A       I just know -- I know the Fifth  
9     Amendment Right.

10          Q       That's the right against  
11     self-incrimination, right --

12          A       Yes.

13          Q       -- you don't have to say  
14     anything to anybody?

15          A       Yes.

16          Q       That's the only Constitutional  
17     right you are familiar with?

18          A       Yes.

19          Q       In the answer to number 26 on  
20     the second page of that document,  
21     document D --

22          A       Yes.

23          Q       -- what medical documents do  
24     you have?

25          A       I have my hospital -- my



1 Lachance Deon Bryant

2 hospital records.

3 Q Sir, I am going to ask you if  
4 you can sign some authorizations. Okay?  
5 Because as a result of you suing the two  
6 officers, we are entitled to get your medical  
7 records, and in order to get your medical  
8 records --

9 A I sent them to you.

10 Q Those authorizations either  
11 never came to me or were improper and were  
12 rejected, so on the record today I'm going to  
13 ask you to sign these documents.

14 Okay?

15 There is an "X" on the bottom  
16 of each page. You will see this is an  
17 authorization for the release of health  
18 insurance pursuant to HIPAA, which is a  
19 Federal law, so I can't get your medical  
20 records unless these documents are signed.

21 A This is what I am not  
22 understanding. How did you get all of my  
23 other paperwork and you don't have all of  
24 that, and that was sent together?

25 Q I don't have the other

1 Lachance Deon Bryant

2 paperwork.

3 A I am not understanding. You  
4 got everything else.

5 Q I got stuff that you sent me,  
6 but I need to get it directly from the  
7 facility.

8 A You have everything else. How  
9 come you don't have my medical records? I  
10 sent you everything with the package that  
11 comes with this.

12 Q What I am telling you is this.  
13 Not only am I entitled to have  
14 you send it to me, I am entitled to get it  
15 directly from whoever provided you the  
16 medical care. Because whatever is missing,  
17 that is important to your case. I may not  
18 have it because maybe they didn't give it to  
19 you, or maybe it didn't come through, so that  
20 is why I need you to sign these documents.

21 A All right. That is no problem.  
22 I just wanted to know, like.

23 Q Yes.

24 That is why each one has an  
25 "X," so I can send it to each one of the

1 Lachance Deon Bryant

2 facilities.

3 A What is HIPAA.

4 Q HIPAA is a Federal statute that  
5 requires this type of form authorizing me to  
6 obtain the records. You have to authorize me  
7 to get the records. I can't just say give me  
8 the medical records.

9 Okay?

10 A Uh-huh.

11 (The witness complies.)

12 Are all of these the same?

13 Q They are all the same, but I  
14 have to send them to different facilities. I  
15 have to send them to Nassau County Hospital,  
16 Nassau County Jail, and I have to send them  
17 to DOCCS?

18 A (The witness complies.)

19 Q Thank you, Mr. Bryant. I  
20 appreciate that. It saves us a lot of time  
21 sending things back and forth. Thank you.

22 At any time that you were  
23 employed either in Minnesota or working for  
24 your friend in Long Beach doing the plumbing  
25 work --

1 Lachance Deon Bryant

2 A Yes.

3 Q -- did you file any tax  
4 returns?

5 A Yes. I filed tax returns for  
6 the one in Minnesota.

7 Q Minnesota.

8 Did you ever file any other tax  
9 returns?

10 A Yes.  
11 2014, '15, I think it was.

12 Q I may send you another  
13 authorization.

14 Let me ask you this.

15 As part of your claim, are you  
16 claiming that you lost earnings?

17 A No.

18 Q No, there is no lost earnings  
19 claim?

20 A No lost earnings.

21 I didn't lose nothing. All I  
22 got is hospital bills. I am pretty sure  
23 that's the only thing I have.

24 Q Before your arrest were you  
25 Medicaid eligible?

1 Lachance Deon Bryant

2 A Medicaid eligible?

3 Q Yes.

4 Did you receive Medicaid  
5 benefits?

6 A Yes.

7 Q If you went to the doctor or  
8 the hospital, Medicaid paid for the visits,  
9 right?

10 A Yes.

11 Q Do you have any reason to  
12 believe that Medicaid didn't pay those visits  
13 after your arrest, like to South Nassau  
14 Communities Hospital?

15 A No. I am pretty sure they did,  
16 but...

17 Q While you are incarcerated, do  
18 you get bills for medical care?

19 A No.

20 Q So Armor Correctional Health,  
21 Inc., do you know what organization or entity  
22 is?

23 A No. But I know when I was in  
24 Nassau County they sent me a document telling  
25 me, like, something about me -- like they

1 Lachance Deon Bryant

2 sent me something from, like, the place on  
3 Charles Lindbergh and Medicaid place, telling  
4 me like it was no longer.

5 Q You were in the Nassau County  
6 Jail in January and February 2017, right?

7 A Yes.

8 Q Did you make sick call  
9 requests?

10 A Yes.

11 MR. MIDDLETON: Mark these  
12 collectively.

13 (Sick Call Requests were  
14 marked as Respondents' Exhibit  
15 F for identification, as of  
16 this date.)

17 Q I will show you Exhibit F of  
18 today's date. Just flip through the pages if  
19 you could.

20 A Yes.

21 Q Are those all in your  
22 handwriting?

23 A Yes.

24 Q Are those documents that you  
25 filled out to get medical attention while in

1 Lachance Deon Bryant

2 Nassau County Jail?

3 A Yes.

4 Q Did they address any of your  
5 requests while you were in Nassau County Jail  
6 for medical attention and care?

7 A Well, they suck. Like they  
8 didn't -- honestly, I was complaining. I  
9 complained so much, that they kicked me out  
10 of medical ward. Like my foot when -- my  
11 feet, I couldn't feel my toes for a little  
12 while, and like they was mad at me. Like I  
13 am -- like I just wanted to walk without a  
14 limp. I didn't want to have that feeling no  
15 more. And they was getting upset at me, keep  
16 trying to give me ibuprofen. I don't even  
17 like to take pills because it bother my  
18 stomach.

19 Q Did you ever break your right  
20 leg before --

21 A Yes.

22 Q -- the incident --

23 A Yes.

24 Q -- in December of 2016?

25 A No. No. I broke my right leg

1 Lachance Deon Bryant

2 2012.

3 Q Right before 2016?

4 A Yes.

5 Q You had surgery on that, right?

6 A Yes.

7 Q They put a rod?

8 A A rod in my right leg.

9 Q How did you break that leg?

10 A Car crash.

11 Q Were you driving?

12 A Yes.

13 Q Were you arrested as a result  
14 of that crash?

15 A No.

16 Q Did you file a lawsuit as a  
17 result of it?

18 A No.

19 Q Was it a one-car or two-car  
20 accident?

21 A One car. I went through the  
22 guardrail on the highway.

23 Q Where did that occur?

24 A That was on the Meadowbrook  
25 Parkway.



1 Lachance Deon Bryant

2 Q Just lost control of the car?

3 A Yes. It was snowing, and I  
4 slid out.

5 Q Other than obviously not having  
6 your front teeth, do you have any complaints  
7 with respect to your mouth area presently?

8 A Yes. Like my whole imagine is  
9 gone. These two teeth right here, like I  
10 can't -- I can't drink nothing. If I drink  
11 something cold, they start to numb in my  
12 mouth. And like I chew different. It is  
13 just -- it is different. The food falls out.  
14 It is different.

15 Q Has the Department of  
16 Corrections indicated they will do anything  
17 for your teeth?

18 A I been trying. They been  
19 telling me they would. Not so far.

20 Q Other than your mouth, does  
21 your head bother you any more where you got  
22 the lacerations?

23 A Well, I still get -- I get  
24 migraines a lot.

25 Q Did you get migraines before

1 Lachance Deon Bryant

2 this arrest?

3 A No.

4 Q Were you ever treated for  
5 migraines before this arrest?

6 A No.

7 Q How often do you get a  
8 migraine?

9 A It comes like maybe like twice  
10 a week.

11 Q Does anything bring them on,  
12 exposure to light, noise, anything else?

13 A No. I just be laying down and  
14 my head hurts. It hurts for like -- maybe  
15 like twenty minutes and go away. I just -- I  
16 have something to drink or try to rub the  
17 side of my head.

18 Q Since being incarcerated after  
19 the 2016 arrest, have you engaged in any sort  
20 of exercise program while incarcerated?

21 A No, no exercise program.

22 Q You said before that you are  
23 not working while in prison, right?

24 A No.

25 Q With respect to your right

1 Lachance Deon Bryant

2 foot, how does that feel now?

3 A Like I still get a little limp,  
4 but it is okay. It really -- I don't know.  
5 It doesn't give me too much problems.

6 Q After you had the boot taken  
7 off and the physical therapy was ended, did  
8 it feel pretty much the same way it feels  
9 now?

10 A No. It is better now.

11 Q How long a period of time did  
12 it bother you after the physical therapy  
13 stopped?

14 A Like maybe, like, five or six  
15 months.

16 Q What did it feel like during  
17 the five or six-month period?

18 A It just felt like -- I used to  
19 get tingly feeling. Like sometimes I had  
20 numbness to the toes, and like the side of my  
21 foot, it hurt. Like it would just give me  
22 deadness, like sometimes it falls asleep when  
23 I am walking. I get to go to sleep, I lay  
24 down, it cramps up, stuff like that.

25 Q After that five to six-month

1 Lachance Deon Bryant

2 period, that diminished?

3 A Yes. It be like problematic  
4 here and there. It will bother me sometimes,  
5 but it is not really like how it used to be.

6 Q When was the last time you had  
7 any treatment for your right foot?

8 A Since physical therapy, that's  
9 the last time.

10 Q When was the last time you had  
11 any treatment for your lacerations in your  
12 head? Was it at the hospital or Nassau  
13 County Jail?

14 A That was in Nassau County.

15 Q In the jail or the hospital?

16 A The jail.

17 Q When was the last time you had  
18 any treatment done to your mouth? Was that  
19 at Five Points?

20 A Yes. It was just recently.  
21 Like I think it was January. I don't know if  
22 it was January I got a tooth -- no. Like  
23 probably, like, it was between, like, August  
24 and now. I know I got the tooth -- I got  
25 this piece right here took out (indicating).

1 Lachance Deon Bryant

2 Q Since being incarcerated since  
3 2017, have you had any visitors from  
4 family --

5 A Yes.

6 Q -- while you were at Nassau  
7 Jail?

8 A Yes.

9 Q Since being transferred  
10 upstate, have you had any visits from family?

11 A Yes.

12 Q Who visited you?

13 A My mom, my sister.

14 Q How much?

15 A They came up here. They came  
16 here once.

17 Q Anybody visit you here while  
18 you have been at Sing Sing?

19 A No.

20 Q How long are you going to be  
21 here in Sing Sing before you are transferred  
22 back?

23 A My guess is as good as yours.  
24 I don't know when they -- whenever court is  
25 done.

1 Lachance Deon Bryant

2 Q Have you seen your son since  
3 you have been incarcerated?

4 A No.

5 Q As part of your claim it's  
6 limited to excessive force, true?

7 A Limited, like.

8 Q The only thing you are suing  
9 these two police officers for is use of  
10 excessive force?

11 A No. Mental anguish.

12 Q I am talking about your  
13 constitutional -- your alleged constitutional  
14 violations.

15 A Yes.

16 Q Is that limited to excessive  
17 force?

18 A I don't understand that.

19 Q Are you suing them for anything  
20 else as a result of the arrest?

21 A No.

22 Q Just using too much force?

23 A Yes.

24 Q As part of that, you are  
25 claiming physical injuries --

1 Lachance Deon Bryant

2 A Yes.

3 Q -- as a result of the alleged  
4 excessive force?

5 A Yes.

6 Q Have you sued these police  
7 officers for negligence at all?

8 A No.

9 Q Are you claiming they were  
10 negligent in the operation of the vehicle?

11 A What do you mean?

12 Q Are you claiming that they,  
13 while they were driving the vehicle, operated  
14 it in a negligent or careless manner?

15 A Yes.

16 Q Are you suing them for punitive  
17 damages?

18 A Yes.

19 Q What is the basis for the  
20 punitive damages?

21 A Basically after, I would say,  
22 like that night, they was careless.

23 Q In addition to excessive force,  
24 are you suing the officers for assault and  
25 battery?

1 Lachance Deon Bryant

2 A I feel like that, the vehicle  
3 assaulted me.

4 Q So the assault and battery  
5 claimant is limited to the accident between  
6 you and the police car?

7 A Yes.

8 Q In your Complaint that we  
9 marked as A, you claim nominal damages?

10 A Yes.

11 Q What do you mean by that?

12 A Well, like I don't -- you know,  
13 I don't know what that means. Like when I  
14 typed everything up, I was helped.

15 Q So you don't know what you  
16 meant by that?

17 A No.

18 (Continued on next page to  
19 include jurat.)

20

21

22

23

24

25



1 Lachance Deon Bryant

2 Q You are not claiming a false  
3 arrest?

4 A No.

5 Q You are not claiming malicious  
6 prosecution?

7 A No.

8 MR. MIDDLETON: Nothing  
9 further.

10 Thank you. I appreciate  
11 your time.

12 (TIME NOTED: 1:32 p.m.)  
13  
14

---

LACHANCE DEON BRYANT

15  
16 Subscribed and sworn to  
17 before me this \_\_\_\_ day  
18 of \_\_\_\_\_, 2019.  
19

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20 NOTARY PUBLIC  
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# INDEX TO TESTIMONY

WITNESS	EXAMINATION BY	PAGE
Lachance Deon Bryant	Mr. Middleton	4

# INDEX TO EXHIBITS

## RESPONDENT'S

EXHIBITS	DESCRIPTION	PAGE
A	Complaint	4
B	Statement	4
C	Handwritten Response to Interrogatories	5
D	Typewritten Response to Interrogatories	5
E	Cover Sheet for United States District Court, Eastern District of New York document	5
F	Sick Call Requests	81

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C E R T I F I C A T E

I, ROBYN LEHRMANN, a Shorthand  
Reporter and Notary Public of the State of  
New York, do hereby certify:

That, LACHANCE DEON BRYANT, the  
witness whose examination is hereinbefore set  
forth, was duly sworn, and that such  
examination is a true record of the testimony  
given by such witness.

I further certify that I am not  
related to any of the parties to this action  
by blood or marriage; and that I am no way  
interested in the outcome of this matter.



ROBYN LEHRMANN



January 28, 2019

DATE

ERRATA SHEET FOR THE TRANSCRIPT OF:

Case Name: BRYANT v. RYAN  
Case Number:  
Dep. Date: January 16, 2019  
Deponent: LACHANCE BRYANT

CORRECTIONS:

Pg.	Ln.	Now Reads	Should Read	Reasons Therefore
-----	-----	-----------	-------------	-------------------

_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
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Subscribed and sworn to  
before me this      day  
of      , 20

Notary Public

\_\_\_\_\_  
Signature of Deponent

<b>A</b>	Antonia 22:19,23	57:23	based 62:13	broken 50:15
am 1:14 7:5,8	anybody 57:4	assume 6:6	basically 42:7	Bronx 22:24 23:6
able 40:21 46:7	75:14 88:17	assuming 55:3	43:25 90:21	24:19
64:4	anyway 37:7	56:11	basis 90:19	brother 33:9
above-entitled 1:17	apartment 25:2	attempted 17:20	battery 90:25 91:4	brothers 23:12
absconding 11:18	appointments	attention 43:21,22	Beach 2:5 4:15	34:7,9
12:3	63:10	81:25 82:6	5:21 6:23 7:11	brought 6:2 13:19
accelerate 40:21	appreciate 78:20	Attica 15:4,4	9:7 11:11,14,20	14:10
accident 44:9,10	92:10	attorney 14:2,6	13:2,19 14:4	Bryant 1:4,17 2:4
48:11 50:22 51:6	approach 60:14	57:25	18:24 19:24 23:15	4:11 5:1,18 6:1
63:13 68:5 71:22	approached 59:12	Attorneys 2:8	23:17 24:17 25:25	7:1 8:1 9:1 10:1
71:24 72:5 83:20	59:23	Auburn 15:3,3	26:4,12,20 27:17	11:1 12:1 13:1
91:5	approximately 7:4	16:16	28:8 53:11 68:24	14:1 15:1 16:1
action 1:18 15:22	7:6	August 17:10,11	78:24	17:1 18:1 19:1
94:15	area 41:15,25	18:2 21:21 68:10	beat 9:5	20:1 21:1 22:1
actions 16:4	42:19,24 48:10,17	68:14 87:23	began 35:10	23:1 24:1 25:1
addition 40:20	55:15,16 84:7	aunt 26:19,22 27:9	believe 80:12	26:1 27:1,12 28:1
90:23	arguing 29:4	27:22,24 31:12,16	benefits 80:5	29:1 30:1 31:1
address 4:12 7:10	argument 31:2	55:5	Bersa 55:23	32:1 33:1 34:1
20:20,22 22:25	armed 54:24 55:3,6	aunt's 28:17 34:8	better 67:16 86:10	35:1 36:1 37:1
23:3 25:14,17	55:9	34:12,22	Betty 26:18	38:1 39:1 40:1
70:9 82:4	Armor 80:20	authorization	bills 79:22 80:18	41:1 42:1 43:1
admit 49:24 55:20	arrest 9:11,20	76:17 79:13	Birch 28:9,10	44:1 45:1 46:1
admitted 50:2 55:8	14:16 15:6,7,15	authorizations	birth 18:18	47:1 48:1 49:1
against- 1:6	15:23,23 16:14,14	76:4,10	black 34:3 55:23,24	50:1 51:1 52:1
AGREED 3:4,9,13	16:15 20:6 56:21	authorize 78:6	blade 15:18 16:8,13	53:1 54:1 55:1
alive 27:5,13	57:12 58:2,7 61:6	authorizing 78:5	bleeding 50:24	56:1 57:1 58:1
allege 13:20	71:18 79:24 80:13	automatic 10:3,4	blood 94:16	59:1 60:1 61:1
alleged 89:13 90:3	85:2,5,19 89:20	29:19 35:4 55:23	blue 33:25,25	62:1 63:1 64:1
allegedly 8:13	92:3	Avenue 25:19,20	BOCES 18:24,25	65:1 66:1 67:1
allowed 41:11	arrested 8:7 9:4,12	average 70:3	body 45:11,14,17	68:1 69:1 70:1
Amadeo 56:10	9:13 11:13,19	avoid 61:6	46:14,15 49:2	71:1 72:1 73:1
ambulance 73:5,6	12:25 13:21,23,25	Avon 20:14,18	bone 50:15 51:18	74:1 75:1 76:1
73:8	19:6 23:20,21	<b>B</b>	boot 63:20,21,22,24	77:1 78:1,19 79:1
Amendment 73:19	24:13 27:23 49:7	B 4:2,23 58:21	64:7,9,11 86:6	80:1 81:1 82:1
73:20 74:20 75:9	49:9 54:6 56:14	93:11	boss 20:24 69:8,10	83:1 84:1 85:1
Amendments 75:2	71:14,14 83:13	back 10:9 12:6 22:5	69:10,14	86:1 87:1 88:1
amount 70:16	arrests 8:12 12:20	22:9 26:25 31:10	bother 82:17 84:21	89:1 90:1 91:1
angle 41:4 43:20	Aside 69:14	38:18.20 39:7,7.8	86:12 87:4	92:1,14 93:5 94:8
47:25 48:6	asked 66:2 73:22	46:20 47:4 48:21	bottom 76:15	built 21:4,6
anguish 89:11	asking 44:17	60:13 68:10 72:23	bought 25:24	bullets 34:25 35:3
answer 6:5 74:5	asleep 86:22	78:21 88:22	box 14:23.23.24,25	bunk 16:9
75:19	assault 9:22.24	bad 19:2	15:2,2 16:25	burglary 17:20
answers 62:4,10	10:11,13 11:10,10	badly 10:8	break 6:9 82:19	burgundy 33:24,25
73:25 74:9	16:5.17 90:24	bandage 64:22	83:9	34:2.4
antibiotics 65:13	91:4	bandages 64:20	bring 6:21 85:11	bus 33:20
65:18,19	assaulted 91:3	bar 15:19	bringing 30:21	business 69:7
	assigned 19:20		broke 82:25	

<b>C</b>	cell 16:9,10	coming 30:8 33:21	County 14:21 58:8	69:22,25 70:20,23
C 2:2 4:2,2 5:4	certificate 19:13	37:11,13 38:12,22	58:11,14 62:18	dead 33:14
61:25 74:4 93:12	certification 3:6	43:5,7,9,11,12,18	63:3 64:2,12,17	deadness 86:22
94:2,2	certify 94:6,14	43:20	65:22 78:15,16	December 7:2 8:2,6
cabs 41:16,19,21,24	cetera 28:12	committing 8:13,17	80:24 81:5 82:2,5	54:13 68:6,14
42:19,21	Chance 22:11,12	Communities	87:13,14	82:24
Calgaro 20:11,25	22:13,14,20 31:23	49:16 80:14	couple 36:6 70:24	Defendant 1:18
call 12:3 37:2 69:11	33:4	company 20:11	course 55:7	Defendants 1:8 2:8
71:7 81:8,13	Channel 28:15	68:18	court 1:2 3:17 5:13	definitely 30:25
93:17	charge 16:6,7	complain 50:18	7:6 18:7 24:9	degree 10:13 13:11
called 20:11 31:16	charged 11:9 15:8	complained 82:9	28:9,10 66:12,20	13:13
31:18 32:2,25	15:11,14	complaining 82:8	70:10 88:24 93:15	denim 33:25
33:8 35:9 36:24	charges 9:4 13:16	Complaint 4:18	cover 5:12 66:19	dental 63:2,5,6
59:24 69:17	Charles 81:3	52:6 56:24 91:8	93:15	Deon 1:4,17 2:4
calling 33:12	Chase 22:10	93:10	covering 18:13,14	4:11 5:1 6:1 7:1
camera 47:24 48:6	check 69:19	complaints 50:7	Coxsackie 16:18,19	8:1 9:1 10:1 11:1
48:19	checked 38:21	84:6	16:22,24,25	12:1 13:1 14:1
CAMPOLO 2:7	Chest 50:19	completely 51:6	cramps 86:24	15:1 16:1 17:1
cams 49:2,2	chew 84:12	complies 78:11,18	crash 83:10,14	18:1 19:1 20:1
ar 32:19 38:8,15	children 22:21	confrontation	Criminal 17:19	21:1 22:1 23:1
38:16,22 39:17,18	Christmas 23:24	54:13	crouched 39:6	24:1 25:1 26:1
39:21 40:7,24	church 21:5,7	confrontations	crucial 46:16	27:1 28:1 29:1
43:18,22 44:2,21	city 9:7 13:19 14:4	53:11	crush 42:4	30:1 31:1 32:1
44:25 45:4,6,18	19:23 20:13 28:11	connected 36:4	custodial 24:3,5	33:1 34:1 35:1
46:5,24 47:9 61:3	36:8,11,11,16,17	connection 17:4	custody 24:6,8	36:1 37:1 38:1
68:5 71:19 72:13	36:18	Constitution 75:3,6	cut 64:25	39:1 40:1 41:1
73:2,4 83:10,21	Civil 1:20	constitutional	Cynthia 26:18	42:1 43:1 44:1
84:2 91:6	claim 71:12,17	75:16 89:13,13		45:1 46:1 47:1
care 19:2 33:15	74:19 79:15,19	construction 20:11	<b>D</b>	48:1 49:1 50:1
63:2,6,6 77:16	89:5 91:9	20:12	D 4:2 5:9 66:6 74:8	51:1 52:1 53:1
80:18 82:6	claimant 91:5	contact 44:22 61:3	75:21 93:13	54:1 55:1 56:1
careless 90:14,22	claiming 63:12	Continued 91:18	damages 90:17,20	57:1 58:1 59:1
carpenter's 19:13	79:16 89:25 90:9	contraband 15:12	91:9	60:1 61:1 62:1
carry 54:9	90:12 92:2,5	15:15 73:11	danger 33:16,18	63:1 64:1 65:1
carrying 29:8	Clinton 18:5,5 57:2	control 84:2	Darwin 22:19	66:1 67:1 68:1
35:17	57:3 65:23	convicted 10:10,11	dash 49:2	69:1 70:1 71:1
cars 41:10,12,18,20	clip 35:4,8,11,15	13:7 17:3,8	date 4:21,25 5:6,11	72:1 73:1 74:1
60:24	55:15,18	convictions 12:20	5:17 17:9 18:18	75:1 76:1 77:1
case 9:3,9 77:17	clips 35:6	cops 33:8	51:22 59:4 66:19	78:1 79:1 80:1
cash 69:20,21	close 26:13	Corinthian 8:5	81:16,18 94:22	81:1 82:1 83:1
cast 63:17 71:8	coat 33:25 34:4,5	corpus 14:10	dating 24:10	84:1 85:1 86:1
atch 61:14	cold 84:11	correctional 1:11	daughter's 21:9,10	87:1 88:1 89:1
caught 26:7 39:11	collectively 81:12	14:14,21 16:16	21:11	90:1 91:1 92:1,14
61:9,11,14	Collins 15:2,2	56:24 80:20	David 68:16 69:3	93:5 94:8
Cedrick 34:14	come 22:5.8 31:15	corrections 6:10	70:7	department 5:22
Cedrick's 34:17	40:24 77:9,19	84:16	day 65:20 70:25	6:23 11:14 49:20
ceiling 71:6	comes 77:11 85:9	counsel 3:5 57:23	92:17	84:15
	comfortable 23:4	count 58:18	days 50:3 63:17	depending 71:2



deposition 3:7,14	drawn 59:13,20	77:14	faster 61:13	following 38:25
deprive 73:20	60:4	entity 80:21	father 21:9,10,12	follows 4:6
deprived 73:18	drink 84:10,10	ESQ 2:10	27:5,22,25	food 84:13
DESCRIPTION	85:16	et 28:12	father's 26:24 27:3	foot 46:20 47:4
93:9	drive 41:18,20 42:2	evening 49:8	27:11	48:21 50:8,10,11
deserve 33:14	42:19,19,21,23	event 8:2	fear 30:12	50:15 51:18 62:24
deserved 33:15	driver's 45:20	eventually 54:23	February 81:6	63:15,17 64:12
determine 46:7	driving 13:3 45:22	examination 1:16	Federal 1:19 76:19	72:9,15,21,23
different 67:6	45:23,24,25 46:2	4:7 93:4 94:9,11	78:4	82:10 86:2,21
68:17,18,20 71:9	83:11 90:13	examined 4:6	feel 23:4 33:15	87:7
78:14 84:12,13,14	drop 35:10	excessive 71:13,16	46:14 82:11 86:2	force 3:15 71:13,16
difficult 6:15	drugs 73:16	71:18 72:5,20	86:8,16 91:2	71:18 72:4,20
diminished 87:2	DUI 12:22	89:6,10,16 90:4	feeling 82:14 86:19	89:6,10,17,22
direct 43:19	duly 4:4 94:10	90:23	feels 86:8	90:4,23
directing 44:5,6		exercise 85:20,21	feet 38:5,7 72:7,18	forgot 16:18 25:16
direction 42:12,13	E	exhibit 4:19,23 5:4	82:11	25:16 71:7
43:12	E 2:2,2 4:2,2 5:16	5:9,16 51:21,21	fell 35:14,15,18	form 3:10 56:18
directly 36:22 37:8	66:19 93:15 94:2	58:21 61:25 66:6	felonies 8:17	78:5
41:3 43:6 77:6,15	94:2	74:4,8 81:14,17	felony 8:23,24	forth 78:21 94:10
disciplinary 15:21	early 23:19	EXHIBITS 93:7,9	felt 33:9,17 86:18	Forty-five 26:14
16:3 18:8	earn 69:23	exposure 85:12	fifteen 12:17	forward 39:5,5,8
discussing 30:9	earning 67:22	extracted 51:5,8	fifteen-minute	found 31:17 55:11
discussion 23:10	70:16		31:14	four 8:11 52:12
28:22	earnings 79:16,18	F	fifth 13:11,13 75:8	62:23 69:25 70:14
dismissed 9:9 13:15	79:20	F 81:15,17 93:17	file 79:3,8 83:16	70:20,23
distance 53:4	East 2:5 4:14 7:10	94:2	filed 52:7 79:5	Fourteenth 74:20
District 1:2,2 5:13	Eastern 1:2 5:13	face 45:19 46:16,22	fill 57:4,7	75:2
5:14 66:20,21	66:21 93:16	facilities 18:9 78:2	filled 56:23 81:25	fractured 50:16
93:15,16	education 18:21	78:14	find 31:20 73:10,14	51:18 63:15
DNA 56:18	effect 3:16	facility 1:11 14:11	fine 13:17	fractures 51:17
DOCCS 78:17	eight 12:19 58:16	14:13,21 16:16	fingerprinted	friend 11:9 68:16
doctor 80:7	58:16 67:22 68:7	56:24 65:23 77:7	56:18	78:24
document 5:14	68:19 69:23 70:17	facing 36:8,11	finished 12:16,19	friends 30:3
51:23 52:4 58:22	Eighth 73:19,20	fact 55:11	first 4:4 8:19,20,22	frisk 72:24,25 73:7
58:23 66:6,8,24	75:2	facts 52:14,16	11:8 30:24 41:11	frisked 72:23
67:3 75:20,21	either 15:22 19:10	fall 16:22	47:12 67:19	front 36:17 39:12
80:24 93:16	27:21 65:21 76:10	falls 84:13 86:22	five 8:11 9:19 10:16	39:14,17,17,21
documents 66:17	78:23	false 92:2	10:17,23 14:14,15	41:18,21 45:8
67:7 75:23 76:13	eligible 79:25 80:2	falsely 13:21	17:22,23 18:6	46:23 48:14,15
76:20 77:20 81:24	Elmira 14:25,25	familiar 74:25 75:5	51:14,15 65:22	50:21 53:16 74:7
doing 30:20 68:15	17:2 19:15	75:17	74:16 86:14,17,25	84:6
69:9 71:4 78:24	emergency 49:19	family 23:24 88:4	87:19	fuck 30:7
dollars 67:22	employed 78:23	88:10	fix 69:12	further 3:9,13 60:9
Donald 48:4	ended 86:7	far 31:11 37:21	flight 34:6	92:9 94:14
door 36:21 39:24	engaged 85:19	39:12 40:5 84:19	flip 52:3 81:18	
double 16:9	entire 37:25 64:2	fast 40:9,14,18,19	Florida 23:17	G
downstate 18:4,5	70:18	40:20 45:15 46:9	flung 42:11	gain 40:12
draw 32:5 53:12	entitled 76:6 77:13	46:10 48:15	follow 54:16	garbage 42:4,5

gate 42:8		hire 14:2	impossible 6:17	J 25:24
getting 8:23 26:25	H 4:2	hit 32:14,19 38:8	improper 76:11	jacket 34:6
67:15 82:15	habeas 14:10	39:13 40:6,16	incarcerated 7:13	jail 58:8,11,14
girl 24:2,10	hairline 65:3,4	42:2 43:20 44:3	14:18 17:25 19:17	62:18 63:3,9 64:2
give 6:5 37:16	hall 28:11 36:8,11	45:13,13,19 46:5	65:21 80:17 85:18	64:13,17 65:22
47:23,24 65:7,14	36:12,16,17,18	46:22 47:10,11,12	85:20 88:2 89:3	78:16 81:6 82:2,5
77:18 78:7 82:16	hallway 18:11	47:14,15,17 48:7	incarceration 7:25	87:13,15,16 88:7
86:5,21	hand 60:8	60:21 72:8,13	14:17 15:7,16	Jamaica 25:19,20
given 19:19 94:12	handcuff 47:6	holiday 23:24	17:4 19:10,11,11	26:2,4,12
giving 23:4	handguns 29:17	holster 35:23	inches 65:4	January 1:13 21:20
go 18:23 25:22 31:9	handwriting 52:20	home 15:5 27:25	incident 5:24 31:16	81:6 87:21,22
42:9 57:18 69:11	81:22	28:20 31:10	47:16 48:11 82:22	94:21
85:15 86:23	handwritten 5:2	Homes 28:15	include 91:19	jeans 33:25 34:2
God 21:8,10,11	67:10 73:25 93:12	honest 23:5 43:11	INDEX 93:2,7	jeopardy 30:20
going 5:23 19:3	hang 44:7	74:21	indicate 59:11	Jeremy 20:25 21:2
24:21 30:23 31:10	hanging 38:23	honestly 44:10 82:8	62:16	job 70:6 71:3
33:6 37:7 48:18	happen 18:25	hoodie 33:25	indicated 68:9	jobs 19:16 69:12,15
51:20 71:5 76:3	happened 13:20	hospital 49:14,16	84:16	John 1:7 5:21 6:22
76:12 88:20	44:18 47:2	51:9,13 63:16	indicates 67:21	jumped 45:2,3
Solombeck 58:3	head 6:13,14 40:3	64:8,9 65:11	indicating 35:14	jurat 91:19
gonna 39:11	50:20,20,24 63:14	75:25 76:2 78:15	36:15,19,20,21	jury 9:5 57:16,18
good 5:18 30:20	64:16,24 84:21	79:22 80:8,14	65:2,3 87:25	
88:23	85:14,17 87:12	87:12,15	indicted 57:21,22	K
gotten 39:10	health 76:17 80:20	hour 26:14	influence 13:4	K 74:12
grade 18:22	hear 71:21	hours 70:24	initial 32:24	K.'s 74:17
graduate 19:5	heard 33:11	house 7:24 24:25	injured 10:8	keep 22:6 61:4 72:9
grand 9:5 57:16,18	held 1:18 23:10	25:3,4,5 28:5,17	injuries 50:17	72:15,18 82:15
grandfather 7:17	help 22:9 57:4	34:8,13,22 53:17	51:17 63:12 89:25	keeping 72:6
7:21	67:15 69:12 73:23	Howard 27:12	inmate 57:9 74:13	kept 54:20
grandmother 7:17	74:8	Hudson 2:5 4:14	inside 48:17	kicked 82:9
grandmother's	helped 57:7 74:4,11	7:11	instruction 54:17	kill 29:23,24 30:5
7:18	91:14	hundred 67:22	54:20	30:15,23,24,24
grandparents 27:2	helper 19:13	68:7,19 69:23	instructions 6:19	killed 30:15
Green 14:22	helping 73:22	70:5,17	insurance 76:18	kind 63:19
Greene 14:23	Hempstead 13:22	hurt 86:21	intention 61:2	knew 31:18 33:8,10
ground 47:3 48:20	23:16 27:19,20	hurting 50:5	interaction 31:3	37:12 38:20 43:16
grow 22:9	hereinbefore 94:9	hurts 85:14,14	interested 94:17	54:23 55:4 61:19
guardrail 83:22	hereto 3:6		interpret 6:16	knocked 51:6 63:15
guess 88:23	hide 15:18 36:5,7	I	interpreter 6:16	know 6:4 10:13
guilty 57:11	hiding 37:14,18	ibuprofen 65:14	Interrogatories 5:3	20:21 21:2 22:25
gun 10:3 23:7 29:5	39:20,22 54:23	82:16	5:8 93:12,14	26:14,18 30:6,18
35:12,18,20 53:21	highest 18:20	idea 43:13	investigator 48:4	31:21 33:5,6,7
54:10 55:11,14,18	highway 2:8 83:22	identification 4:20	involved 19:24 68:5	34:15 36:25 37:4
59:13,19 60:4	Hill 23:7 24:24	4:24 5:5,10,16	Isaiah 34:15	37:4,11 38:17,18
guns 29:12,15 33:7	25:15	81:15	Island 21:3,14	39:10,10 41:13
35:14 44:11 53:24	HIPAA 76:18 78:3	illegal 54:7	issues 18:8	43:10,12,15,17,18
54:5 56:13,16,20	78:4	imagine 84:8		43:19 44:6 45:14
guy 68:21,22		important 77:17	J	46:9,10,19,25



Page

47:9,15 49:3  
54:25 55:2,2 56:5  
57:20 58:4 59:3  
59:22,22 60:5,8  
61:10,12 74:22  
75:8,8 77:22  
80:21,23 86:4  
87:21,24 88:24  
91:12,13,15

L

L 4:2  
L-E-R 69:5,6  
lacerations 64:16  
84:22 87:11  
Lachance 1:4,16  
2:4 4:11 5:1 6:1  
7:1 8:1 9:1 10:1  
11:1 12:1 13:1  
14:1 15:1 16:1  
17:1 18:1 19:1  
20:1 21:1 22:1  
23:1 24:1 25:1  
26:1 27:1 28:1  
29:1 30:1 31:1  
32:1 33:1 34:1  
35:1 36:1 37:1  
38:1 39:1 40:1  
41:1 42:1 43:1  
44:1 45:1 46:1  
47:1 48:1 49:1  
50:1 51:1 52:1  
53:1 54:1 55:1  
56:1 57:1 58:1  
59:1 60:1 61:1  
62:1 63:1 64:1  
65:1 66:1 67:1  
68:1 69:1 70:1  
71:1 72:1 73:1  
74:1 75:1 76:1  
77:1 78:1 79:1  
80:1 81:1 82:1  
83:1 84:1 85:1  
86:1 87:1 88:1  
89:1 90:1 91:1  
92:1,14 93:5 94:8  
Lakeview 15:3,4  
latest 17:4

Laurie 58:3  
law 76:19  
lawsuit 5:25 6:21  
9:6 13:18 52:9  
54:2 73:23 83:16  
lawsuits 14:3,3  
19:22,25  
lay 86:23  
laying 48:20 85:13  
learn 31:15  
leather 34:5  
leave 22:3 25:11  
31:7  
leaving 33:11  
Leddy 1:7 5:21  
6:22 44:6  
left 25:12,21 36:10  
37:18 40:25 44:8  
44:8,8 45:2,3 65:5  
65:11  
leg 82:20,25 83:8,9  
legal 54:7  
legs 45:13  
Lehrmann 1:21  
94:4,22  
length 37:24  
let's 14:16 32:20  
letting 30:6  
level 18:20  
license 45:20,25  
licensed 54:9  
lie 19:3  
life 7:14 29:7 30:12  
30:19 33:16,17  
light 18:13,14  
85:12  
lights 38:14,22  
60:15  
limited 89:6,7,16  
91:5  
limp 82:14 86:3  
Lindbergh 81:3  
line 30:12  
listed 67:19  
literally 37:9 38:15  
little 42:3 51:8 60:9  
82:11 86:3  
live 7:14,15,23

22:16,23 23:15  
24:17 27:2,7,17  
28:8 31:11 70:10  
lived 8:3 21:24 25:8  
26:20 31:12  
lives 22:17,24 23:7  
23:16,17,18 24:19  
25:15 27:9,19  
28:9  
living 20:17,18,23  
20:24  
LLP 2:7  
loaded 34:23  
local 68:22 69:11  
long 2:5 4:14 5:21  
6:23 7:11,11 9:7  
11:11,13,20 12:9  
12:10 13:2,19  
14:4 18:24 19:24  
21:3,14,19,24  
23:15,17 24:17  
25:25 26:4,11,12  
26:20 27:17 28:8  
28:16 31:2 37:14  
44:20 45:22 50:2  
53:11 62:20 63:22  
65:16,17 68:24  
70:11 71:3 78:24  
86:11 88:20  
longer 81:4  
longest 28:19  
look 30:7,19 38:11  
51:23 58:22 61:25  
66:6,22  
looked 31:23 38:20  
38:24 63:4  
looking 38:18 39:4  
39:7,7 43:14,15  
43:17,23  
lose 50:21 79:21  
lost 79:16,18,20  
84:2  
lot 8:18 67:6 78:20  
84:24  
lying 29:2  
  
M  
mad 29:6 30:11

82:12  
making 67:25 68:6  
68:19  
malicious 92:5  
manner 90:14  
Marcus 43:8,10  
mark 4:17 81:11  
marked 4:18,22 5:3  
5:8,15 51:21  
61:24 66:5,19  
81:14 91:9  
marriage 94:16  
matter 5:20 94:17  
McCORMICK 2:7  
McCray 7:20,22  
Meadowbrook  
83:24  
mean 7:25 32:18  
41:13 47:21 54:8  
70:24 90:11 91:11  
meaning 15:16  
45:9  
means 6:16 22:8  
74:23 91:13  
meant 91:16  
Medicaid 79:25  
80:2,4,8,12 81:3  
medical 75:23 76:6  
76:7,19 77:9,16  
78:8 80:18 81:25  
82:6,10  
medications 65:11  
Memorial 2:8  
Mental 89:11  
met 21:3,8  
middle 39:23  
Middleton 2:7,10  
4:8,16 5:19 23:8  
44:13 61:22 81:11  
92:8 93:5  
migraine 85:8  
migraines 84:24,25  
85:5  
military 20:4  
millimeter 56:3  
mine 48:5  
Mini 55:25  
Minnesota 20:10

20:13,15,16,19  
21:13,15,25 68:2  
68:10,13 78:23  
79:6,7  
minutes 26:15  
28:19 31:5,6  
85:15  
misdemeanor  
11:10  
misdemeanors 8:14  
missing 77:16  
mom 22:5,17 88:13  
money 68:2 70:17  
month 51:11 63:24  
63:25  
months 9:19 12:12  
12:17,19 58:17  
70:14,15 86:15  
morning 5:18  
23:19 49:10,11  
54:6  
mother 27:13  
mother's 27:3,4  
mouth 50:19 63:5  
84:7,12,20 87:18  
move 20:15 44:13  
72:8  
moved 20:16 21:16  
42:6 58:14  
  
N  
N 2:2 4:2,2,2  
name 4:9 5:19 7:19  
8:4 22:10,18  
24:15 27:11,15  
30:9,21 32:2,25  
34:16,16 35:10  
57:8 59:25 69:2  
70:7 71:7 74:17  
Nassau 14:21 49:15  
58:8,11,14 62:18  
63:3 64:2,12,16  
65:22 78:15,16  
80:13,24 81:5  
82:2,5 87:12,14  
88:6  
nature 11:5,7  
need 6:8,9 72:17

77:6,20 negligence 90:7 negligent 90:10,14 neighborhood 69:12 never 24:8,9 30:9 49:5 60:3 61:14 61:14,15,15 73:3 76:11 new 1:2,2,12,22 2:5 2:9 4:5,15 5:14 13:22 16:23 21:5 49:18 58:6 66:21 75:6 93:16 94:6 night 23:19 24:13 54:5 90:22 nine 58:16,16 nods 6:13 noise 85:12 nominal 91:9 Nope 19:21 normally 40:23 Notary 1:21 3:15 4:4 92:20 94:5 NOTED 92:12 noticed 47:18 numb 46:15 84:11 number 56:6 59:9 67:18 75:19 numbered 52:12 numbness 86:20	office's 67:9,11 officer 2:13 6:10,22 6:22 32:2,5,8,25 33:21 35:9 38:19 38:23,25 44:5 47:4,6 48:20 52:23,25 59:12,19 59:22,23,24 71:22 officer's 61:3 officers 5:20 6:2 32:19 43:19,23 49:3 54:12 56:17 56:19 61:19 71:13 76:6 89:9 90:7,24 ointment 65:8 okay 6:10 26:16 27:20 32:22 44:19 51:25 57:3 69:6 76:4,14 78:9 86:4 old 22:14,15 24:20 once 31:17 63:11 88:16 one-car 83:19 one-half 51:7 ones 74:7 operated 90:13 operation 90:10 opposite 42:11,13 order 22:9 48:8 76:7 orders 48:18 organization 80:21 Orleans 14:24,25 16:24 Ossining 1:12 outcome 94:17 Owens 24:16	80:8 pain 46:14 50:19 Paller 69:3 70:7 Pallor 69:4 papers 7:7 paperwork 76:23 77:2 parents 27:4 park 28:15 41:10 41:11 43:6,6,7,9 parked 36:6 38:16 40:2 60:12 parking 41:12,15 Parkway 83:25 parole 9:3 10:24,25 11:2,6,7,16,22 12:6 13:24 53:18 part 44:19 45:6,11 46:14,16 79:15 89:5,24 parties 3:5 94:15 parts 64:24 passenger 45:9,10 pay 69:19 80:12 paying 43:21,22 people 29:3,3,25 30:8 42:9 people's 69:12 period 44:20 60:17 60:20 65:17 70:11 86:11,17 87:2 person 22:7 68:18 72:13 Pertaining 15:24 Peter 1:7 5:20 6:22 phrase 74:23 physical 62:17,21 63:8,10 64:10 86:7,12 87:8 89:25 piece 51:8 87:25 pills 82:17 place 1:19 11:3 43:6,6,7,10 81:2,3 Plaintiff 1:5,17 4:3 playing 30:14 plea 17:14,16 18:2 58:10	plead 10:15,16 13:8 17:18 pleas 12:21 please 4:10,13,16 pled 10:18 57:11 plumbing 68:15 69:13 78:24 pocket 71:10 Points 14:14,15 18:6 51:14,15 65:22 74:16 87:19 police 5:20,21 6:23 11:14 31:16,19,21 31:25 32:5,7,25 33:12,22 35:9 36:13,21 38:8,25 40:7,24 43:2,4,5 43:16,18,23 44:21 44:25 45:18 46:18 47:4,6,9,22 49:3 53:12 54:12,23 61:16,19 68:5 71:21 73:2,3 89:9 90:6 91:6 portion 51:4 portions 44:14 position 33:17 possession 13:12,13 17:19 56:20 post 10:17 17:22,23 precinct 48:5,5 Precisely 28:13 prepared 62:6 66:8 preparing 62:3 Presbyterian 21:5 21:7 prescribed 65:10 present 2:12 19:10 presently 84:7 pretty 37:7 40:21 79:22 80:15 86:8 prior 7:25 8:6 20:6 prison 12:7,11 14:11,13 15:9,12 15:15,22 16:4 59:8 85:23 private 48:4 Pro 2:4	probably 8:10 26:13,15 87:23 probation 9:19 10:23 problem 77:21 problematic 87:3 problems 86:5 Procedure 1:20 proceed 67:13 proceeding 57:17 57:19 program 85:20,21 prosecution 92:6 protecting 42:9 provided 77:15 psychiatric 65:24 66:3 psychological 65:24 66:3 Public 1:21 3:15 4:4 92:20 94:5 pull 29:15 pulled 29:5 34:21 punitive 90:16,20 pursuant 1:19 14:9 76:18 put 30:11,19 33:16 46:19 47:4 63:19 63:21 65:8 72:15 72:20 73:2,3,8 83:7 putting 48:21 71:6 72:9,18
O O 4:2 Oak 70:10 objections 3:10 objects 71:8 obtain 78:6 obviously 84:5 occur 7:4 11:11 83:23 occurred 5:24 7:2 47:16,18 48:11 62:14 63:13 72:5 Oceanside 49:17,18 offender 8:21 office 58:4 62:7 66:9 74:2	P P 2:2,2 P-A-L-L-O-R 69:4 p.m 92:12 package 77:10 page 52:11 59:5 67:19 75:20 76:16 91:18 93:4,9 pages 52:3 81:18 paid 70:17 71:10	P P 2:2,2 P-A-L-L-O-R 69:4 p.m 92:12 package 77:10 page 52:11 59:5 67:19 75:20 76:16 91:18 93:4,9 pages 52:3 81:18 paid 70:17 71:10	Q Queens 23:22 24:18,23 25:8,11 25:12,24 question 3:11 6:3,5 6:7,7 44:16 questions 5:24 51:24 62:7 66:9 67:10,11 73:25 74:5 quickly 40:22	R R 2:2 4:2 94:2

<p>an 32:9,11,12,13 32:24 33:18 35:25 37:20 39:25,25 60:12 61:20 ray 50:12 razor 15:18 16:8,13 re-routing 71:4 really 10:12 13:24 45:14 50:6 53:5,8 53:9 86:4 87:5 rear 39:18 40:2,5 41:24 reason 37:2 44:4 72:9 80:11 recall 66:23 receive 80:4 recognize 52:4 recollection 62:14 record 4:9,13 6:6 23:9,11 76:12 94:11 records 76:2,7,8,20 77:9 78:6,7,8 red 42:8 reflect 6:6 regular 53:19 rejected 66:12,14 66:17 76:12 related 26:23 94:15 relation 28:11 release 10:17 76:17 released 10:22 58:11 remember 10:12 13:10 16:20 17:9 20:21 25:14,18 26:6 31:25 32:3 50:6 51:11 52:25 59:15,17 62:3 67:6,8 rephrase 6:4 Reporter 94:5 reporting 12:2,4,14 13:24 represent 5:19 requests 81:9,13 82:5 93:17 requires 78:5</p>	<p>reserved 3:11 resided 7:12 respect 18:9 44:17 73:24 84:7 85:25 respective 3:5 RESPONDENT'S 93:8 Respondents' 4:19 4:23 5:4,9,15 81:14 response 5:2,7 62:6 66:9 67:9,10 93:12,13 responses 6:13 67:18 responsive 44:15 rest 9:2 restrain 46:18 result 6:25 8:13,16 9:6 12:5 17:14 50:22 54:3,19 63:13 76:5 83:13 83:17 89:20 90:3 resulted 5:25 results 9:2 return 12:10 68:13 returns 79:4,5,9 revolver 29:21 35:22 56:9 73:13 Richmond 24:24 25:15 ride 26:11 right 9:9 14:7 17:5 28:14 32:23 33:20 33:21 35:15 36:9 36:22,24 37:11 39:19 40:25 41:2 41:9,19 42:12 43:2 45:8,9 47:12 50:11 52:2 56:3 62:8 65:2 66:25 75:9,10,11,17 77:21 80:9 81:6 82:19,25 83:3,5,8 84:9 85:23,25 87:7,25 rights 24:4,5 73:19 73:20 74:20</p>	<p>robbery 9:13,15 Robert 34:11 Robyn 1:20 94:4,22 rod 83:7,8 rolled 46:23 Ronkonkoma 2:9 Rossi 56:10 Roughly 28:18 rub 85:16 Rules 1:20 run 32:9 35:10 37:19 38:10 39:8 40:16,22 41:3 61:16 runner 40:19,21 running 31:24 32:14 35:13,16 38:21 39:5 40:9 40:13 42:14,15 43:5,24 48:15 53:4 54:20,22 61:4,15 Ryan 1:7 5:20 6:22</p> <p style="text-align: center;"><b>S</b></p> <p>S 2:2 Samone 48:4 saves 78:20 saw 46:4,11 60:3,14 saying 33:11 says 7:7 52:14,15 scabs 64:23 scare 30:16 scene 71:23,25 school 18:23 19:3 Scott 2:10 5:19 Se 2:4 sea 32:7 sealing 3:6 second 8:22 17:20 59:5 75:20 seconds 37:17 44:23 46:4,11 60:23 section 23:6 sections 75:6 sec 6:10 30:7 34:19 36:23 38:11,14,24</p>	<p>44:2,21 47:14,17 48:9,13 52:11,17 52:19,22 56:13 58:23 59:5,11 60:9 67:3,18 72:12 76:16 seeing 66:23 seen 31:22 37:3 44:4,7 47:19 48:14,16,18 89:2 self-incrimination 75:11 send 77:14,25 78:14,15,16 79:12 sending 78:21 sense 72:11,12,14 72:19 sent 12:6 62:7 66:9 67:6,9 76:9,24 77:5,10 80:24 81:2 sentence 17:21 sentenced 8:24 9:17,18 17:7,8,10 September 17:11 18:2 68:11 serial 56:5 serve 10:20 served 10:21 58:19 set 94:9 Seven 17:22,23 Shakima 24:16 Shakima's 25:6 shaking 6:14 sheet 5:12 66:20 93:15 shit 33:7 shoot 10:6 shooting 13:25 Shorthand 94:4 shots 10:9 show 47:22 48:22 51:20 58:21 61:24 66:5,18 81:17 showed 56:16 shower 64:5 showers 71:4 shows 48:17,19</p>	<p>sick 81:8,13 93:17 side 27:3,3 32:16 36:14 38:16 45:9 45:10 65:5 69:15 85:17 86:20 sidewalk 32:16,18 37:21 39:9,10 40:12 41:11 61:9 sign 76:4,13 77:20 signature 59:6 signed 3:14,16 76:20 Sing 88:18,18,21,21 Sing-Sing 1:11 sinks 71:4 Sir 76:3 sister 26:24 88:13 sister's 21:9,10,11 sisters 23:13 situation 11:9 22:4 six 9:18 22:15 24:21 86:14 six-month 86:17,25 sixteen 46:3 sleep 86:23 slid 84:4 sliding 39:24 smoking 13:5 sneakers 34:3 snowing 84:3 soap 15:19 somebody 13:25 30:22 34:20 67:15 73:21,23 74:4 son 22:6,8 23:25 24:2,4,20,21 34:14,15,17 89:2 son's 22:5,10 soon 36:22 37:5 38:16,19,21 sort 16:3 23:23 65:7 73:15 85:19 sought 65:23 South 49:15 80:13 speak 6:9 specific 59:4 speed 40:12 46:8 spot 37:18</p>
--	--	--	---	---



<p> <b>taff</b> 16:5,17  <b>tand</b> 6:8 32:13,14  36:2,3 48:6,15,24  <b>start</b> 54:2 84:11  <b>started</b> 29:4 31:24  35:16 38:10 39:8  40:15  <b>state</b> 1:22 4:5,9,12  73:18 75:6 94:5  <b>statement</b> 4:22  60:10 93:11  <b>States</b> 1:2 5:13  66:20 93:15  <b>station</b> 25:24 26:2  28:11 31:18 32:12  32:13 33:20,22  36:2,4,13,21  <b>statute</b> 78:4  <b>stay</b> 28:16 46:20,21  72:10,16,16  <b>stayed</b> 50:3  <b>staying</b> 72:17  <b>step</b> 32:20  <b>tepped</b> 38:17  60:13  <b>stepping</b> 60:11,24  <b>steps</b> 40:8,16  <b>STIPULATED</b> 3:4  3:9,13  <b>STIPULATIONS</b>  3:2  <b>stitches</b> 51:2  <b>Stockdale</b> 34:11  <b>stomach</b> 82:18  <b>stop</b> 33:3 53:20  54:3,14  <b>stopped</b> 53:20,23  55:9 86:13  <b>street</b> 2:5 4:14 7:11  25:18,23 41:4,7,8  41:9,14 43:8,10  47:13 60:12  <b>strike</b> 44:14 45:4  45:12,17  <b>striking</b> 71:19  <b>truck</b> 45:6 46:13  46:17 72:13  <b>Strunk</b> 8:5 27:16 </p>	<p> <b>study</b> 18:25  <b>stuff</b> 64:19 71:6  77:5 86:24  <b>subject</b> 73:21  <b>Subscribed</b> 92:16  <b>suck</b> 82:7  <b>sued</b> 90:6  <b>Suffolk</b> 23:18  <b>suing</b> 76:5 89:8,19  90:16,24  <b>Suite</b> 2:9  <b>supposed</b> 67:13  <b>sure</b> 37:7 53:5,8,9  59:19,21 67:5,12  79:22 80:15  <b>surgery</b> 83:5  <b>sworn</b> 3:16 4:4  92:16 94:10 </p> <p style="text-align: center;"><b>T</b></p> <p> <b>T</b> 4:2 94:2,2  <b>table</b> 37:23,25 38:3  38:4  <b>take</b> 6:9 32:20  37:16 51:22 58:22  61:25 64:4 65:17  66:6,22 71:3  82:17  <b>taken</b> 1:18,20  49:14,15,19 86:6  <b>talk</b> 14:16 28:25  <b>talked</b> 29:2  <b>talking</b> 18:10 30:2  89:12  <b>tape</b> 47:24 48:2  <b>tapes</b> 48:13,14,16  <b>tasks</b> 19:20  <b>tax</b> 79:3,5,8  <b>taxi</b> 32:13,14,17,18  36:2,3 39:9,13,14  39:16 40:2,6  41:23 47:12,14,15  47:18,23 48:6,15  48:16,17,23  <b>taxis</b> 32:15 36:6  37:15 38:11 47:11  48:18 60:11,14  <b>teeth</b> 50:22 51:5 </p>	<p> 63:14 84:6,9,17  <b>tell</b> 33:3 46:25 50:5  50:14 51:16 56:19  <b>telling</b> 29:3 37:6  44:8 46:21 72:10  72:15 77:12 80:24  81:3 84:19  <b>ten</b> 28:19 37:17  38:5,7  <b>terminated</b> 24:7  <b>testified</b> 4:6 60:18  <b>testimony</b> 93:2  94:11  <b>Thank</b> 78:19,21  92:10  <b>Thelma</b> 7:20  <b>therapist</b> 62:17  <b>therapy</b> 62:21 63:9  63:10 64:10 86:7  86:12 87:8  <b>thing</b> 23:24 67:14  79:23 89:8  <b>things</b> 42:6 71:5,9  78:21  <b>think</b> 13:9,10,11  62:22,22 79:11  87:21  <b>thinking</b> 33:13  <b>thought</b> 55:5 67:14  <b>thousand</b> 67:22  68:7,19 69:24  70:18  <b>threaten</b> 29:24  <b>threatened</b> 29:6,23  <b>three</b> 18:9 23:12  40:8,16 50:3  62:23 63:17 69:25  70:14,20,23  <b>three-minute</b> 28:14  <b>threw</b> 35:12  <b>ticket</b> 18:13 25:25  <b>tickets</b> 16:2  <b>Tiger</b> 57:8  <b>time</b> 1:19 3:11 6:3  6:8 7:16,24,24  8:19,20,22,22,25  14:19 25:9,11  26:8 28:2,4 29:9 </p>	<p> 32:21 33:5 44:20  48:10 53:24 55:9  58:13,19 60:18,21  64:2 65:17 68:4  70:11,18 72:22  78:20,22 86:11  87:6,9,10,17  92:11,12  <b>times</b> 8:9,18  <b>tingly</b> 86:19  <b>today</b> 14:7 76:12  <b>today's</b> 51:22 66:19  81:18  <b>toes</b> 82:11 86:20  <b>told</b> 13:22 19:23  29:25,25 30:2,9  37:12 46:20 48:3  48:4 50:16 54:24  55:3,5 67:16  <b>tomorrow</b> 24:22  <b>tooth</b> 87:22,24  <b>top</b> 16:8 52:16  <b>town</b> 30:4,22  <b>tracks</b> 36:9,12,14  42:10,15,16  <b>traffic</b> 38:12  <b>train</b> 25:24 26:6,11  28:11 31:18 32:11  32:12 33:20 36:2  36:4,9,14 42:12  42:15,16  <b>training</b> 19:9  <b>transferred</b> 88:9,21  <b>trauma</b> 63:14  <b>treat</b> 49:22  <b>treated</b> 62:17 85:4  <b>treatment</b> 64:12,15  65:24 66:3 87:7  87:11,18  <b>trial</b> 1:16 3:12  10:14 17:15 57:14  <b>tried</b> 40:11  <b>true</b> 57:12 62:11  66:13 68:7,11,12  89:6 94:11  <b>try</b> 36:5 85:16  <b>trying</b> 22:6 30:4  32:15,17 37:22 </p>	<p> 41:3 82:16 84:18  <b>tunnel</b> 36:23  <b>Twelfth</b> 18:22  <b>twelve</b> 12:12  <b>twenty</b> 85:15  <b>twice</b> 85:9  <b>two</b> 6:2 10:9 19:22  28:13 29:12 31:4  31:6 32:15 36:7  44:23 46:4,11  50:21 60:23 65:4  70:5 76:5 84:9  89:9  <b>two-car</b> 83:19  <b>two-second</b> 60:17  60:20  <b>type</b> 10:2,4 22:7  35:22 73:15 78:5  <b>typed</b> 67:9,17  91:14  <b>typewritten</b> 5:7  74:7 93:13  <b>typing</b> 67:16 </p> <p style="text-align: center;"><b>U</b></p> <p> <b>U.S</b> 75:2  <b>uh-huh</b> 6:14 78:10  <b>uh-uh</b> 6:14  <b>Um-hum</b> 46:6  60:16 74:3  <b>undergo</b> 62:20  <b>underneath</b> 33:20  34:2  <b>understand</b> 6:3,18  89:18  <b>understanding</b>  76:22 77:3  <b>understood</b> 6:7  <b>United</b> 1:2 5:12  66:20 93:15  <b>upper</b> 48:19  <b>upset</b> 82:15  <b>upstate</b> 16:25 58:15  88:10  <b>use</b> 9:14,23 72:4  89:9 </p> <p style="text-align: center;"><b>V</b></p>
--	--	--	---	---

Valerie 27:16	way 36:14,20 37:13	worked 21:20 69:9	12:45 7:7	400 2:9
vehicle 47:22 60:14	43:5 44:25 46:18	70:13,20	15 79:11	4175 2:8
60:21 90:10,13	47:19 86:8 94:16	working 20:7,9,10	16 1:13 67:18	5
91:2	we'll 44:18	21:4 48:7 69:14	17A3781 59:8	5 93:12,14,16
vehicles 42:18,23	weapon 9:14,23	69:23 78:23 85:23	2	6
verbal 6:13	10:2 17:19 32:6	works 69:8	2002 8:20,20 9:11	7
version 67:17	52:23 53:2,6 56:6	worrying 38:18	12:21 19:7	8
Veterans 2:8	73:12,15	wouldn't 61:9,10	2004 8:19,23 9:20	81 93:17
videotape 47:21	weapons 16:6,7	write 14:10 59:2	14:16 15:7,23	83 2:5 4:14 7:10
videotapes 47:20	29:8,13 34:21	73:23	16:14,15	9
48:10	53:12 54:7,7	wrote 52:19,22	2005 8:24 10:18	9 55:24 56:3
violated 74:20 75:7	73:10	58:25 67:14	2006 16:21	900 70:3
violation 9:3 11:8	wear 63:22	Wyoming 14:23,24	2007 19:15	
11:17,23 53:18	wearing 33:23,24	16:23	2009 10:21 45:23	
violations 11:3,6	64:11	X	45:25	
12:6 89:14	weed 13:5	x 1:3,9 50:12 76:15	2010 10:20 11:8	
visit 27:21 88:17	week 63:11 67:23	77:25	12:10 53:16	
visited 27:24 88:12	68:7,19 69:22	Y	2012 83:2	
visitors 88:3	70:2,4,18,21,24	Y 4:2	2013 11:19 12:13	
visits 63:10 80:8,12	85:10	Yeah 18:15 23:2	2014 9:4 11:24	
88:10	weeks 62:23	38:6 40:17 53:7	12:18 13:18 15:6	
W	went 12:15 14:20	54:15 61:18	79:11	
vaist 35:19,21	14:22,23,24,25	year 17:12	2015 12:24 21:22	
waiting 36:25	15:2,2,3,4 16:23	years 9:19 10:17,23	2016 7:2 8:6 12:21	
waived 3:8	16:24,25 17:2	17:22,22,23,23	15:16,23 16:14	
walk 28:14 31:14	18:4,5 24:9 25:23	22:15	20:6,16 21:23	
37:9,10,10,19	25:24 26:2 27:24	Yep 28:24 29:16	54:13 57:12 58:2	
82:13	45:15 51:13 73:5	York 1:2,2,12,22	68:6,11 82:24	
walked 33:18,19	80:7 83:21	2:5,9 4:5,15 5:14	83:3 85:19	
36:22	weren't 42:14	13:22 49:18 58:6	2017 17:13 18:2	
walkie-talkie 60:7	43:21 59:19 60:11	66:21 75:6 93:16	81:6 88:3	
walking 31:22 37:8	68:6	94:6	2019 1:13 92:18	
39:5 86:23	Westbury 58:6	youthful 8:21	94:21	
want 51:22 82:14	Whichever 17:9	Z	24 70:10	
wanted 30:13,15,16	Willard 12:16,16	0	25 7:2 8:6 10:3,5	
30:18,23 77:22	William 7:22	1	54:13 68:6	
82:13	window 38:23 44:7	1:32 92:12	25th 8:2	
ward 34:14,16	windshield 45:18	11:30 25:13,21	26 75:19	
82:10	46:23	11:50 1:14	28 94:21	
Washington 14:20	wiped 64:19	111th 25:23	3	
14:22,22	witness 78:11,18	113th 25:19,20	3/16/85 18:19	
wasn't 22:7 37:16	93:4 94:9,12	11561 2:5 4:15	31 28:9	
38:13,15,20 40:11	WOLPINSKY	11779 2:9	38 56:8 73:12	
40:13 41:6,6,8,13	2:13	12:30 7:5 28:7	4	
41:14 44:9,10	word 30:3,22		4 93:5,10,11	
48:7 64:18 67:12	Wore 63:24			
watch 37:9,10	work 21:4,16,19			
	48:8 70:12 78:25			